

We all gonna be fucking in an indictment. I'm gonna be down for a RICO. You gonna be down for a RICO. You gonna be down for a RICO. We all gonna be down.

- Angel ROLDAN, KING BIG-A, August 31, 2019

AFFIDAVIT OF SPECIAL AGENT DOMINIC COPPO

I, Special Agent Dominic Coppo, depose and state as follows:

INTRODUCTION

1. I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I also am a “federal law enforcement officer” as defined in Rule 41(a)(2)(C) of the Federal Rules of Criminal Procedure, that is, a government agent who is engaged in enforcing the criminal laws of the United States and within a category of officers authorized by the Attorney General to request a search warrant.

2. I have been a Special Agent with the Federal Bureau of Investigation (“FBI”) since May 2012. I am currently assigned to the Boston Field Office, North Shore Gang Task Force.

3. Since 2012, I have received training and experience in interviewing and interrogation, arrest procedures, search and seizure, gangs, narcotics, search warrant applications, and various other investigative techniques and methods. In my tenure as an FBI Special Agent, I have served as a Case Agent, or assisted other agents in the investigation of various criminal violations; however, I have predominantly been assigned to work federal gang and narcotics investigations as a member of the FBI Safe Street Gang Task Force. The FBI assigned me to concentrate on federal gang and narcotics investigations after being assigned to the El Paso Division, Midland Resident Agency, and West Texas Major Offender Safe Street Gang Task

Force in 2013, I was later assigned the position of task force coordinator in 2015. During my tenure as a Special Agent assigned to the El Paso Division, Midland Resident Agency, I served as the Case Agent investigating several different gang and criminal organizations. These include, but are not limited to a set of the Bloods Street Gang, and a support club of the Banditos Outlaw Motorcycle Gang. I was also a member of the Texas Gang Investigators Association, attending several weeklong conferences outlining local, state, and national gangs, criminal organizations, and the criminal methodologies associated with such. Upon completion of my assignment in El Paso Division, Midland Resident Agency, I was transferred to the Boston Division North Shore Gang Task Force in 2016, where I am currently assigned. In the course of my training and experience, I have become familiar with the methods and techniques associated with the distribution of narcotics, the laundering of drug proceeds, the organization of drug conspiracies, as well as traditional gang methodologies and structures.

4. Since December 2016, I have focused my efforts on the Almighty Latin King and Queen Nation ("LATIN KINGS"). I am currently investigating members and associates of LATIN KINGS for: racketeering activity and conspiracy to commit the same, in violation of 18 U.S.C. § 1962(c) and (d); violent crimes in aid of racketeering activity, in violation of 18 U.S.C. § 1959; felon in possession of firearm and ammunition, in violation of 18 U.S.C. § 922(g)(1); the using, brandishing, and discharging of a firearm during the commission of a crime of violence or drug trafficking offense, in violation of 18 U.S.C. § 924(c); and the manufacture of controlled substances, distribution of controlled substances, possession of controlled substances with intent to distribute, and conspiracy to commit those offenses, in violation of 21 U.S.C. §§ 841(a)(1), and 846 (the "TARGET OFFENSES"). Collectively, the LATIN KINGS leaders, members and associates described herein will be referred to as the TARGET SUBJECTS.

5. In the course of my training and experience, I have become familiar with the methods and techniques associated with the distribution of narcotics, the laundering of drug proceeds, and the organization of drug conspiracies, as well as traditional gang methodologies and structures. In the course of conducting these investigations, I have been involved in the use of the following investigative techniques: 1) interviewing Cooperating Witnesses (“CWs”), including CW-1,¹ CW-3², and CW-9,³ Confidential Informants (“CIs”), and other human Sources of Information (“SOIs”); 2) conducting physical surveillance; 3) conducting short-term and long-term narcotics and gang investigations; 4) consensual monitoring and recording of both telephonic and non-telephonic communications; 5) analyzing telephone pen register and caller identification system data; 6) conducting court-authorized electronic surveillance; 7) conducting court-authorized Title III wiretap investigations; 8) conducting controlled purchases of narcotics and firearms; and 9) preparing and executing search warrants that led to substantial seizures of

¹ **Cooperating Witness 1 (“CW-1”).** CW-1 began cooperating with law enforcement in 2014. CW-1 has been a member of the LATIN KINGS for approximately eleven (11) years. The information provided by CW-1 has been found to be reliable and has been corroborated by other investigative means. CW-1 receives financial compensation in return for cooperation. CW-1 has numerous convictions for crimes of violence, theft and motor vehicle offenses. CW-1 has a substance abuse disorder.

² **Cooperating Witness 3 (“CW-3”).** CW-3 has been cooperating since January 2018. CW-3’s cooperation is financially motivated. The information provided by CW-3 is based on CW-3’s membership within the LATIN KINGS for approximately fifteen years. The information provided by CW-3 has been found to be reliable and has been corroborated by other investigative means. A check of CJIS indicates CW-3 has one pending case and no convictions.

³ **Cooperating Witness 9 (CW-9).** CW-9 has been cooperating since July 2018. The information provided by CW-9 is based on CW-9’s long standing membership and highly placed position within the Massachusetts LATIN KINGS. CW-9 is cooperating in hopes that it will mitigate pending federal charges. CW-9 has also received subsistence payments and financial support from the FBI during the time CW-9 has been cooperating. The information provided by CW-9 has been found to be reliable and has been corroborated by other investigative means. A check of CJIS indicates CW-9 has convictions for drug offenses, crimes of violence and property offenses.

narcotics, firearms, and other contraband.

6. The information contained in this affidavit is based on my own investigation, oral and written reports by other law enforcement officers, physical surveillance, information from confidential informants/cooperating witnesses, public records, database checks, court-authorized interceptions of telephonic communications, prior investigations undertaken of the LATIN KINGS, and other investigative techniques. My interpretations of phone calls intercepted pursuant to court orders and consensually recorded conversations are based upon the above information as well as my training and experience. The dates and times in this affidavit are approximate. I am submitting this affidavit in support of the government's motions to detain following sixty two (62) individuals pending trial pursuant to 18 U.S.C. § 3142(e).⁴

BACKGROUND ON THE ALMIGHTY LATIN KING AND QUEEN NATION

7. The LATIN KINGS is one of the largest criminal organizations in the world, with thousands of members across the United States. The LATIN KINGS were formed in Chicago, which continues to serve as the nerve center for regional and local chapters that operate in cities and local communities across the United States. The LATIN KINGS' greatest strength is the organization itself: the gang's strict hierarchy, adherence to a national manifesto, internal judicial methods, and sophisticated system of communications make the gang a formidable threat. The LATIN KINGS leverage this vast, interdependent criminal network to raise revenue through criminal and non-criminal enterprises. The gang's operations are protected by violence, both

⁴ Throughout this affidavit, the shorthand UI is used to refer to unintelligible words from a recording. The shorthand UM or UF are used to refer to an unknown male or unknown female. The shorthand FNU and LNU are used to refer to individuals whose first names are unknown or last names are unknown. Additionally, unindicted coconspirators are identified by initials, where appropriate.

internal (towards uncooperative or untrustworthy members) and external (towards rival gangs, witnesses, informants, and law enforcement). The LATIN KINGS are an established, organized, and well-funded criminal organization.

A. Formation

8. The LATIN KINGS was formed in the 1960's in Chicago. The gang's stated purpose was the organization of Hispanics dedicated to overcoming an "oppressive government" and uplifting all "third world" people. The original intent of the gang was to empower its members to improve their quality of life. To achieve these goals, the LATIN KINGS developed the King Manifesto and Constitution (KMC) to establish laws, rules, and regulations governing the behavior of its members, which has evolved into a detailed code of organizational and behavioral principles.

9. The KMC explains the doctrine of "Kingism," the developmental evolution of LATIN KINGS members. According to a copy of the KMC obtained by investigators in April of 2018, "Kingism" is comprised of three stages: 1) the Primitive Stage – "a stage of immaturity where the King Warrior's time is spent "gang-banging;" 2) the Conservative Stage/the Mummy Stage – "the King Warrior becomes tired of the . . .senseless routine of gang fighting, hanging on the corner, or being big and bad;" and 3) the New King Stage – "[the King Warrior] learns to appreciate the values of work, life and Brotherhood." Despite acknowledging "gang banging" in the Primitive Stage, the KMC explicitly states that the "conduct of every King should always be highly impeccable and above reproach."

10. Loyalty to the LATIN KINGS is central to the gang's ideology. It is built in part through social events that allow members to meet and form connections. This is exemplified by the LATIN KINGS' periodic "Unity Day," during which local and regional members meet and

fraternize. Social support between members also takes the form of fundraising efforts; for example, one chapter can raise funds for the family of a member who recently died. On the other hand, the gang's methods for ensuring that members remain loyal are far harsher: violations of the gang's rules, especially cooperation with law enforcement, are met with draconian punishments, including fines, demotion, physical violence, shootings, and other organized reprisals by the LATIN KINGS, up to and including death.

B. Identification

11. LATIN KINGS affiliation is demonstrated in a variety of ways. Members display the gang's colors (gold and black) and symbols (a five pointed crown, sometimes worn by a lion) on flags, clothing, and tattoos. When encountering other LATIN KINGS or posing for pictures, members sometimes place their fist over their heart or twist their fingers into the shape of a crown. Additionally, LATIN KINGS often mention "amor de rey," (meaning "love of the king" in Spanish), "amor," or "ADR" in conversation. Typically, these phrases are used at the beginning and end of conversations between members to affirm their commitment to the gang. Intercepted conversations between LATIN KINGS have demonstrated that these phrases also play a more functional role in furthering criminal activities, such as indicating a member's willingness to engage in a drug transaction. Members understand that using "ADR" and its derivatives is a strong indicator of their LATIN KINGS affiliation.

C. Funding

12. The LATIN KINGS funding flows from its membership through collection of dues and the success of illegal operations. The KMC mandates that each chapter contribute to a common fund known as the "fundo" that is used for bail, weapons purchases, booking hotel rooms for meetings, and other joint gang activities. Individual members are expected to pay

regular dues, tribute (usually in the form of a percentage of revenues derived from illegal activities), and fines if they violate the gang's rules. In turn, a percentage of these monies are either passed to the regional leadership for their use or maintained in the chapter fundo.

13. Each chapter's fundo is controlled by its Inca and held by its Treasurer.

Mismanagement can lead to consequences through the LATIN KINGS judicial system.

D. Drug Trafficking

14. In addition to raising funds through dues, drug trafficking is a profitable enterprise for the LATIN KINGS. Distribution of marijuana is the only type of drug trafficking formally accepted by the gang. However, gang members sell a wide variety of drugs including cocaine, cocaine base, heroin, and fentanyl. A portion of the proceeds of these drug transactions are expected to be remitted to local leadership.

15. The quantities and types of drugs sold by the LATIN KINGS vary significantly from chapter to chapter. For example, in Massachusetts, the New Bedford Chapter is deeply involved in cocaine and cocaine base trafficking that supplies customers in New Bedford and Boston. The operation is complex and profitable, utilizing multiple stash houses (referred to as trap houses) and branching into the laundering of the drug proceeds through real estate transactions. These activities will be described in greater detail later in this document.

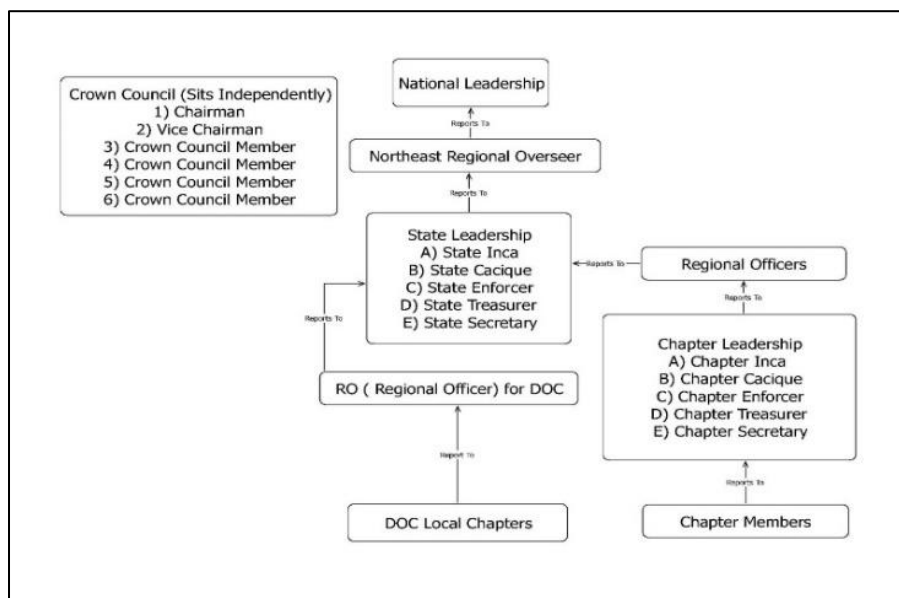
E. Violent Acts

16. The LATIN KINGS' reliance on drug distribution to create revenue, the desire to further the influence of the gang, and the desire to protect turf from rival gangs has fostered a culture of institutional violence and secrecy. Members have committed crimes of violence including shootings, robberies, home invasions, extortion, and homicides. LATIN KINGS are expected to come to the aid of their fellow members on request. Thus, whenever the economic

or other interests of the gang (such as its primacy in certain designated geographic areas or the drug trafficking activities of its members) are threatened, members are required to participate in organized actions aimed at mutual protection. These actions frequently take the form of “missions,” which are acts of violence directed at rivals. By adhering to a strict “code of silence” as outlined in the KMC, the LATIN KINGS conceal these activities from law enforcement and perpetuate the cycle of drug trafficking, violence, and intimidation.

F. Organizational Structure

17. The LATIN KINGS have a highly organized hierarchical structure at the national, regional, and local levels. The leadership at each level is comprised of an Inca and a team of supporting officers consisting of a Cacique, (or second-in-command), an Enforcer (responsible for maintain obedience within the membership, executing punishments, coordinating violence against rivals, and maintaining the gang's arsenal), a Treasurer (responsible for the collection of dues, tributes, and fines, and the maintenance of the fundo), and a Secretary (responsible for maintaining records and the administration of the gang's business). A graphic depicting the typical structure of the LATIN KINGS follows:



LATIN KINGS Organizational Structure

18. The LATIN KINGS divide the country up into different regions and a “Regional Overseer” acts as a liaison between that region and Chicago, sitting at the head of a “Regional Table” made up of the most senior member of the LATIN KINGS in each state. The regional leadership has a great deal of influence in the selection of the State Team. The “Regional Overseer” can appoint a “Regional Crown Council” and “Regional Enforcer” if he so chooses.

19. Within most states that “State Team” is comprised of an “Inca,” “Cacique,” “Enforcer,” “Treasurer,” and “Secretary” who are charged with ensuring that all local chapters are following the national directives and resolving any conflict that cannot be dealt with at the local level. “State Regional Officers” report on local chapter activities and issues to the “State Team.”

20. Each local chapter is also comprised of an “Inca,” “Cacique,” “Enforcer,” “Treasurer,” “Secretary,” and other members. In addition, a separate body governs the Department of Corrections and any issues that arise while LATIN KINGS members are incarcerated, and this body reports directly to the “State Team.” Finally, there is a “Crown Council” that sits independently and is comprised of a “Chairman,” “Vice Chairman,” and various “Crown Council Members.” The “Crown Council” resolves any issues that cannot be resolved by the state leadership.

21. The rigid organizational structure of the LATIN KINGS is typified by its comprehensive judicial system. In this system, members are formally "charged" with violations of the KMC or other gang rules. Those charges are adjudicated, and individuals found guilty are punished, often severely. Punishments have included fines, beatings, and sometimes expulsion from the gang, depending on the offense. Members who cooperate with law enforcement may

face particularly harsh, violent punishment, including death in some cases.

LATIN KINGS MEMBERSHIP

22. The investigation of the LATIN KINGS has identified a multi-tiered and hierarchical structure of leadership of LATIN KINGS criminal activities. The investigation has developed evidence that the LATIN KINGS criminal enterprise has committed numerous acts of drug distribution, shootings, witness intimidation, witness retaliation, and murder. This investigation has developed probable cause as to the involvement of the following individuals in an ongoing conspiracy to violate 18 U.S.C. §§ 924(c), 1959, and 1962, and 21 U.S.C. §§ 841(a)(1), and 846.

I. THE LATIN KINGS EAST COAST TEAM

23. The following individuals have been identified as being associated with the East Coast Regional Leadership of the LATIN KINGS.

Michael CECCHETELLI, A/K/A “KING MERLIN”

24. CECCHETELLI is the current Supreme East Coast Regional Overseer of the LATIN KINGS for the East Coast. Formerly, CECCHETELLI was the Inca of Massachusetts. The evidence of CECCHETELLI’s membership in the LATIN KINGS is overwhelming, including self-admission on Facebook, numerous recordings where he is interacting with LATIN KINGS membership and exercising a leadership role, and participation and attendance at meetings and trials, and directing enterprise activities and appointing individuals to leadership roles and also demoting individuals for transgressions.

25. On 9/15/06, CECCHETELLI was convicted of conspiracy to deal in firearms without a license, and other firearms offenses in Massachusetts U.S. District Court as part of a prior federal investigation of the LATIN KINGS in 2005 and sentenced to 37 months in

prison. See U.S. v. Cecchetelli, et. al., 05-CR-03003-MAP.⁵

Esther ORTIZ, a/k/a “QUEEN INDIA”

26. E. ORTIZ is the current East Coast Crown Council Chairwoman. The evidence of E. ORTIZ’s membership in the LATIN KINGS is overwhelming, including self-admission on Facebook, numerous recordings where she is interacting with LATIN KINGS membership and exercising a leadership role, and participation and attendance at meetings and trials, and conspiring in commission of acts of violence.

Eric THOMAS, a/k/a “KING E”

27. THOMAS is the current State Inca for Rhode Island. The evidence of THOMAS’ membership in the LATIN KINGS is overwhelming, including self-admission on Facebook, numerous recordings where he is interacting with LATIN KINGS membership and exercising a leadership role, and participation and attendance at meetings and trials, and acting on orders to assist in acts of violence.

Joel L. FRANCISCO, a/k/a “KING CASPER”

28. J. FRANCISCO is a member of the Rhode Island LATIN KINGS. The evidence of J. FRANCISCO’s membership in the LATIN KINGS comes from recordings as well as historical evidence where he was referred to as the “Crown Prince of the LATIN KINGS.”

Hector Manuel VEGA, a/k/a “KING DEMON”

29. VEGA is a member of the Crown Council for Connecticut. The evidence of

⁵ This prosecution involved CECCHETELLI’s possession of a sawed-off shotgun. See Docket No. 05-CR-03003, ECF #1.

VEGA's membership in the LATIN KINGS is overwhelming, including self-admission on Facebook, numerous recordings where he is interacting with LATIN KINGS membership and exercising a leadership role, and participation and attendance at meetings and trials, and acting on orders to assist in acts of violence.

II. THE LATIN KINGS MA STATE TEAM/CROWN COUNCIL

30. The following individuals have been identified as being associated with the Massachusetts State Leadership of the LATIN KINGS.

Bienvenido NUNEZ, a/k/a "KING APACHE"

31. NUNEZ is the current Inca of Massachusetts for the LATIN KINGS. NUNEZ's role and membership in the LATIN KINGS have been confirmed by his attendance at numerous meetings and gatherings of LATIN KINGS members and recordings where he is referred to by other members. Additionally, NUNEZ's legacy and history in the LATIN KINGS has been repeatedly referenced by other members in recent months as they undertook the selection process of the new Inca of Massachusetts following the recent ouster of LIBERATO.

32. NUNEZ was previously convicted in Massachusetts U.S. District Court of distribution and possession with intent to distribute cocaine, and felon in possession of a firearm, as part of a prior federal investigation of the LATIN KINGS in 2015 and sentenced to 18 months in prison. See U.S. v. Nunez, Docket No. 15-CR-30036-MGM.

Jorge RODRIGUEZ, a/k/a "KING G"

33. Jorge RODRIGUEZ is the current Cacique of the State of Massachusetts for the LATIN KINGS, and the former State Enforcer. Jorge RODRIGUEZ's role and membership in the LATIN KINGS have been confirmed by his attendance at numerous meetings where LATIN KINGS business and criminal activity are discussed, and numerous recordings where Jorge

RODRIGUEZ can be seen and heard exercising a leadership role over other LATIN KINGS members.

Michael MARRERO, a/k/a “KING CLUMSY”

34. MARRERO is the Enforcer for the State of Massachusetts for the LATIN KINGS. MARRERO’s role and membership in the LATIN KINGS have been confirmed by various recordings where he is in attendance with other LATIN KINGS leaders, including CECCHETELLI, ROLDAN, NUNEZ, CALDERON, LIBERATO and Jorge RODRIGUEZ.

35. On 4/27/07, MARRERO was convicted of distribution of cocaine in Massachusetts U.S. District Court as part of a prior federal investigation of the LATIN KINGS in 2005 and sentenced to 114 months in prison. See U.S. v. Marrero, 05-CR-03047-TSH.

Francisco LOPEZ, a/k/a “KING CISCO”

36. F. LOPEZ is the Secretary / Treasurer of Massachusetts State for the LATIN KINGS. F. LOPEZ’s role and membership in the LATIN KINGS have been confirmed by his frequent attendance at meetings where LATIN KINGS business is discussed and recordings where other members refer to his membership and role in recorded conversations.

Juan LIBERATO, a/k/a “KING PRODIGY”

37. LIBERATO is the former Inca of Massachusetts for the LATIN KINGS. LIBERATO’s role and membership in the LATIN KINGS have been confirmed by his attendance at numerous meetings, intercepted calls where LATIN KINGS business is discussed, and recordings where he is present and exercising a leadership role over LATIN KINGS affairs. Additionally, he is referred to by other members by his LATIN KING name.

38. On 9/2/18, a LATIN KINGS party took place in Haverhill at “Matty’s house.” LIBERATO was not present, but his 15 year old daughter, who I will refer to as DAUGHTER

and who is also a member of LATIN KINGS, was present, along with numerous other LATIN KINGS members. At some point during the party, a LATIN KINGS member sexually harassed LIBERATO's DAUGHTER. In response, numerous LATIN KINGS members assaulted and beat this individual. Police later found him on the street severely injured, and the individual was taken to the hospital. Numerous phone calls were intercepted advising LIBERATO of the situation.

39. LIBERATO was intercepted pursuant to a court-authorized wiretap discussing the consequences for this transgression, and talking with other members, including Jorge RODRIGUEZ to discuss retaliation. At one point, LIBERATO spoke to his DAUGHTER and advised her that the offending individual was seriously beaten, and will be killed. The following is a draft transcript of a portion of the conversation:

LIBERATO:	Ah, your mom is calling me asking me what's going on. I'm gonna tell her listen, I was hours away, I had no clue.
DAUGHTER:	I'm gonna go get food.
LIBERATO:	The less she would've know the better. Anyway, he has twelve concussions, and a like ten broken bones [UI].
DAUGHTER:	Really?
LIBERATO:	Yeah. A lot of broken bones, a lot of concussions [UI] he's gonna get more. [UI] turn back but they'll be here tomorrow.
DAUGHTER:	What?
LIBERATO:	The brothers are coming tomorrow.
DAUGHTER:	Do I have to be home or not?
LIBERATO:	No [UI] what you want and stuff but still we were talking about this earlier before, you know how we feel about sex offenders and shit.

DAUGHTER: Yeah.

LIBERATO: These brothers are, are the ones that are to do the other stuff. That there's not gonna be no hospital *it's gonna be just to the morgue.*
[UI]

DAUGHTER: Yeah.

LIBERATO: But then I'm gonna make more phone calls in the morning and stuff to the other people so then--these conversations don't happen over the phone and stuff so when you call, you call I say I got to talk to you, we meet up, and we talk in person this stuff that way
[UI]

40. On 8/31/18, LIBERATO was intercepted pursuant to a court-authorized wiretap discussing firearms and ammunition with ISRAEL RODRIGUEZ, a/k/a KING IMPERIAL. The two discuss various calibers of ammunition for I. RODRIGUEZ, which they refer to as “food,” and a .25 caliber firearm, which I. RODRIGUEZ refers to as a “twenty-five year old chick.” I know that LIBERATO possesses a license to carry, owns a number of firearms, and can legally purchase ammunition. The following is a draft transcript of a portion of the conversation:

I. RODRIGUEZ: Aight um so a question um, I need food.

LIBERATO: Oh yeah just come to my house and shit and we'll go pick'em up.

I. RODRIGUEZ: Uhm, [clears throat] I gotta I gotta twenty-five year old chick.

LIBERATO: Oh yeah bro damn. Aight cool just lemme know and stuff bro.

I. RODRIGUEZ: But you got that, you got food on deck for her?

LIBERATO: Nah not now. We can always go and pick some up.

I. RODRIGUEZ: Aight cause um I also I got I got other food um that I'm willing to trade for food I need.

LIBERATO: Yeah yeah yeah just dude um I'm off tomorrow just bring it to my house and we'll see what's up.

I. RODRIGUEZ: Aight cause um I mean your phone is gucci right?

LIBERATO: Huh? Yeah.

I. RODRIGUEZ: Aight so basically um forty-five, nine, and thirty-eight. (OV) Is what I, is is is that's basically what I have.

LIBERATO: Okay

I. RODRIGUEZ: Um and but I got basically almost full boxes of all three of those but what I don't have and I need is twenty-five and twenty-two.

LIBERATO: Oh nice twenty-two is always hard to find bro we could always find that shit dude. Um yeah because if you want we could meet up tomorrow and shit dude. And not even that...

I. RODRIGUEZ: Aight

LIBERATO: Twenty-five should work. Twenty-five is bro ... if you buy the wrong bullet like if you buy bullets bro ... they're non-refundable and shit like it's no exchange either. So you gotta find out what twenty-five short, twenty-five long twenty-five what?

I. RODRIGUEZ: Um I got a little pocket jump-off.

LIBERATO: Yeah um...

I. RODRIGUEZ: Called a shorty

41. I. RODRIGUEZ then inquires of LIBERATO if certain types of ammunition will be more lethal. LIBERATO explains that for "gangsters," the type of ammunition will not matter "as long as you hit the guys." LIBERATO then explains that "hollow points" expand in your body. I. RODRIGUEZ then inquires if hollow points carry a greater penalty, and then if hollow points are "cop killers." LIBERATO responds that a regular bullet can kill a police officer if you "shoot the cop in the head." The following is a draft transcript of a portion of the conversation:

I. RODRIGUEZ: Now yo now another thing too is is there different um so like different brand? Does it matter?

LIBERATO: *Not not for gangsters it really don't matter in stuff dude cause as long as you hit the guys* (UI)

I. RODRIGUEZ: Because I got I gotta I gotta box a a a nines right. But then I just got a new nether (UI) box a nines that are Winchester full metal jackets, range and and target.

LIBERATO: Yup range just means ... that's like the cheaper brand. You just gonna keep (UI). Like if I was to hit you with those they'll they'll go in and out where hollow points they expand in your body and turn into mushrooms they turn into flowers and shit dude.

I. RODRIGUEZ: Yeah yeah yeah

LIBERATO: *So it would, it doesn't really matter and shit dude cause niggas, they'll wait until you walk by to make sure they get you they both work they both...* work. And the hollow point (OV) the hollow points or whatever you get less and you pay more so...

I. RODRIGUEZ: Yeah yeah

LIBERATO: (UI) as much as you get for hollow points you gonna get five of them.

I. RODRIGUEZ: Well I got...

LIBERATO: For like fifty bucks (OV)

I. RODRIGUEZ: I got I got I had but the thing that I got came with six hollows. So I

LIBERATO: Aight

I. RODRIGUEZ: But those those are hot box so I took those out and I replaced them with regulars. (Laughs)

LIBERATO: No dude they wouldn't be hot box why would it be hot box bro? (OV)

I. RODRIGUEZ: Cause nigga. Cause if you get bagged with that shit ain't it ain't it more than ... ain't them popo ... you know what i mean?

LIBERATO: Bro no no that's shit's dumb they gonna charge they gonna charge you wit wit wit anything. They're gonna charge you just for um illegal possession of firearm. They're gonna charge you for illegal possession of um ammo, ammunition. If it's ten plus rounds in the magazine they're gonna charge you with that. They're gonna charge you if there's a school zone you get... depending on the bullet they don't care.

I. RODRIGUEZ: *Oh ok ok. I thought for those hollows the hollows you get more money cause they supposedly cop killers.*

LIBERATO: *Nah listen, regular bullets are cop killers bro all you gotta do is shoot the cop in the head cause (UI) in the vest.*

I. RODRIGUEZ: Yeah yeah yeah

LIBERATO: (UI) that's just dumb.

I. RODRIGUEZ: Aight no doubt no doubt no doubt, no, because, because

LIBERATO: Dude (OV)

I. RODRIGUEZ: - the reason the reason I was asking is cause I got two different boxes a nines and I didn't wanna trade one if the other one was better. You know what I mean?

LIBERATO: Well bro I don't I don't trade nines rounds I'll just take all your bullets and then I just give you, you can buy your own bullets. Cause cause Hey but um ... hey! Look up R" "I", "R-I-P-nine-M-M" look at those um bullets on youtube bro. Those things...

I. RODRIGUEZ: Yeah

LIBERATO: are fifty bucks for twenty of them. Um when you gotta chance you go to youtube and put "R-I-P-nine-M-M"

I. RODRIGUEZ: No doubt

LIBERATO: That's right do that (UI) and let me know if you watch any of those videos bro. It's insane.

I. RODRIGUEZ: What did you say? "R-I-P-mad-M-M?"

LIBERATO: Yeah it's not like you know rest in peace? nine millimeter. "Nine-M-M."

Angel ROLDAN, a/k/a "KING BIG A"

42. ROLDAN is the former Cacique for Massachusetts for the LATIN KINGS. ROLDAN has also historically held leadership roles in the D5K Chapter. ROLDAN's role and membership in the LATIN KINGS have been confirmed by his attendance at numerous meetings

of the State Team and D5K cyphers, and also through recordings where he is present and exercising a leadership role over LATIN KINGS affairs. ROLDAN also facilitates communication with the DOC Chapter through BARROS and CORREA. Additionally, he is referred to by other LATIN KINGS as a member.

43. ROLDAN was previously convicted in Massachusetts U.S. District Court of conspiracy to distribute cocaine base, and distribution of cocaine base as part of a prior federal investigation of the LATIN KINGS in 2006 and sentenced to 68 months in prison. See U.S. v. Follis, et. al., Docket No. 06-CR-10267-NMG.

Gregory PEGUERO-COLON, a/k/a “KING TRECE”

44. PEGUERO-COLON is the current Chairman of the Massachusetts Crown Council for the LATIN KINGS. In that role, PEGUERO-COLON maintains the various literature and files of the LATIN KINGS and has distributed emails attaching these materials to a cooperating witness. PEGUERO-COLON’s role and membership in the LATIN KINGS have been confirmed by his attendance at numerous recorded meetings with other leaders and references by other members to the leadership role that PEGUERO-COLON holds.

45. On 9/14/99, PEGUERO-COLON was convicted of being a felon in possession of a firearm in Massachusetts U.S. District Court and sentenced to 52 months in prison (Docket No. 98-CR-30021-MAP).

III. THE LATIN KINGS MASSACHUSETTS DOC CHAPTER

46. The following individuals have been identified as being associated with the DOC Chapter of the LATIN KINGS.

Fruitos BARROS, a/k/a “KING FRUITY”

47. BARROS is the current Supreme Regional Officer of the DOC Chapter for the

LATIN KINGS. In this role, BARROS is responsible for maintaining the LATIN KINGS chapters within the DOC system. BARROS is in constant communication with the State Team and the various DOC facility chapters through his appointed Secretary, SANDRA CORREA, a/k/a “QUEEN DREAM.” BARROS’ leadership role and membership in the LATIN KINGS have been confirmed by DOC records, recorded jail calls, self-admission on jail calls, and photographs. On 3/3/15, BARROS was convicted of conspiracy to commit murder and armed home invasion, among other offenses in Essex Superior Court and sentenced to a approximately twenty-five years of incarceration. See Docket No. 1377CR01393.

Sandra CORREA, a/k/a “QUEEN DREAM”

48. CORREA is the former Secretary of the DOC Chapter for the LATIN KINGS. In this role, CORREA was responsible for maintaining the communication between the DOC and the State Team. CORREA’s leadership role and membership in the LATIN KINGS have been confirmed by recorded jail calls, self-admission on jail calls, and photographs.

Shaun HARRISON, a/k/a “REV”

49. HARRISON is a member of the LATIN KINGS who is currently incarcerated at the DOC for the Attempted Murder of Victim 18, a 17 year old drug dealer who owed HARRISON a drug debt. HARRISON’s membership in the LATIN KINGS has been confirmed by recorded jail calls, self-admission on jail calls, and photographs of gang tattoos.

Vincent DZIERWINSKI, a/k/a “KING VICE”

50. DZIERWINSKI is a member of the LATIN KINGS who is currently incarcerated in the DOC. DZIERWINSKI’s membership in the LATIN KINGS has been confirmed by DOC records.

IV. THE LATIN KINGS DEVON STREET KINGS (D5K) CHAPTER

51. The following individuals have been identified as being associated with the D5K Chapter of the LATIN KINGS.

Wilson PEGUERO, a/k/a “KING DUBB”

52. W. PEGUERO is the Inca of the Devon Street Kings Chapter of the LATIN KINGS. Various pictures, social media posts, and references by other members confirm him as a leader within the LATIN KINGS. W. PEGUERO is also featured on numerous YouTube videos with other members of D5K holding money, flashing firearms and gang signs, and rapping about shooting members of rival gangs. In addition,

Alexis PEGUERO, a/k/a “KING LEXI” and “KING LOONEY”

53. A. PEGUERO is the Cacique of the Devon Street Kings Chapter of the LATIN KINGS. Various pictures, social media posts, and references by other members confirm him as a leader within the LATIN KINGS. A. PEGUERO is also featured on numerous YouTube videos with other members of D5K holding money, flashing firearms and gang signs, and rapping about shooting members of rival gangs.

Steven Familia VALDEZ, a/k/a “KING HAZE”

54. FAMILIA-VALDEZ is a former member of the Devon Street Kings Chapter of the LATIN KINGS. Various pictures, social media posts, and references by other members confirm him as a member of the LATIN KINGS. FAMILIA-VALDEZ is also featured on numerous YouTube videos with other members of D5K holding money, flashing firearms and gang signs, and rapping about shooting members of DDP among others.

55. During the 3/23/18 meeting, FAMILIA-VALDEZ is recorded saying that he accidentally sold 100 grams of fentanyl to a customer thinking it was cocaine base. At a meeting on 1/23/19, FAMILIA-VALDEZ is captured accusing ROLDAN of owing him \$20,000 for 7

pounds of marijuana.

Dante LARA, a/k/a “KING NASTY”

56. D. LARA is a member of the Devon Street Kings Chapter of the LATIN KINGS. Various pictures, recordings, social media posts, and references by other members confirm him as a member of the LATIN KINGS.

57. On 7/11/14, Boston Police responded to reports of a person stabbed at 1031 Tremont Street. Upon arrival, they located a victim suffering from a stab wound to his lower abdomen. The victim provided a general description of the suspects as “Hispanic males.” Officers retrieved a video from Boston Hooka Store located at 1027 Tremont Street. The video depicts D. LARA approaching the victim, ultimately punching him in the face with a closed fist. The victim backed away from D. LARA to avoid getting hit again when LATIN KINGS member K.D. is captured coming around the corner and stabbing the victim. K.D. and D. LARA run down the street and arrested shortly thereafter following a car stop. A witness was transported to the scene of the car stop and identified D. LARA and K.D. The victim was treated at Brigham and Women’s Hospital for a non-life threatening stab wound to the lower left abdomen.

58. On 3/23/18, D. LARA is captured showing a bag of cocaine base to W. PEGUERO, A. PEGUERO during a cypher.

Robert LARA, a/k/a “KING RIZZ”

59. R. LARA is a member of the Devon Street Kings Chapter of the LATIN KINGS. Various pictures, social media posts, and references by other members confirm him as a member of the LATIN KINGS.

60. On 12/17/17, CW-3 reported that R. LARA assaulted two Bloods gang members at a party following a greenlight being issued by W. PEGUERO and PALACIOS. CW-3, CW-9,

W. PEGUERO, and ROLDAN were present for this meeting.

61. On 3/17/19, R. LARA is captured “violating” (beating) Oscar PENA at a cypher. Following the beating R. LARA complains his “knuckles are bleeding” and Oscar PENA is overheard complaining that his ribs are broken.

Matthew PALACIOS, a/k/a “KING NENE”

62. PALACIOS is the Enforcer of the Devon Street Kings. Various pictures, recordings, social media posts, and references by other members confirm him as a leader within the LATIN KINGS.

63. At the 3/30/18 D5K meeting PALACIOS is captured saying that he “lost both joints” (firearms) and wants to buy a firearm with a “wooden handle” that E.F. is selling for \$450. PALACIOS indicates he will only pay \$400.

Marlon RIVERA, a/k/a “KING PLUTO”

64. Marlon RIVERA (M. RIVERA) is one of the founders of the Devon Street Kings Chapter and formerly the Inca of the Fitchburg Chapter of the LATIN KINGS. Various pictures, social media posts, DOC records, and references by other members confirm him as a member of the LATIN KINGS. M. RIVERA is also featured on numerous YouTube videos with other members of D5K holding money, flashing firearms and gang signs.

65. M. RIVERA was intercepted over court-authorized wiretap engaging in drug deals with F. LOPEZ. Following one of these interceptions officers conducted a car stop and recovered 14 grams of cocaine base from M. RIVERA.

66. According to information provided by CW-9, on 2/4/19 LATIN KINGS member J.M. went with M. RIVERA and LATIN KINGS member W.V. to commit a home invasion in Boston. During the home invasion J.M. was killed.

67. On 2/23/19, M. RIVERA is captured on video giving CALDERON 1.5 grams of cocaine base.

Angel ORTIZ, a/k/a “KING ABBY”

68. Angel ORTIZ is a member the Devon Street Kings Chapter of the LATIN KINGS. Various pictures and references by other members confirm him as a member of the LATIN KINGS.

69. On 6/14/18, CW-3 and ROLDAN went to Angel ORTIZ’s house to cut approximately 100 grams of heroin. Angel ORTIZ was present and assisted in processing the heroin.

Angel RODRIGUEZ, a/k/a “KING ACE”

70. Angel RODRIGUEZ is a member the Devon Street Kings and Crown Council Chairman of the Boston Crown Council of the LATIN KINGS. Various pictures, social media posts, YouTube videos, DOC records, and references by other members confirm him as a member of the LATIN KINGS.

71. In addition to his participation in the acts of violence while in DOC custody, A. RODRIGUEZ called into a D5K meeting on 3/23/18 to discuss issues with an individual I will refer to as Victim 19, and attended a State Team meeting on 4/21/18.

72. A. RODRIGUEZ is also featured rapping on numerous YouTube videos with other members of D5K holding money, flashing firearms and gang signs, and rapping about shooting members of rival gangs.

73. One of the music videos is titled "Enemy's" (sic), posted on 6/8/19, available at <https://www.youtube.com/watch?v=34pUWu-Mzml>. W. PEGUERO and A. PEGUERO both appear in the video as well. A. RODRIGUEZ lyrics speak of his willingness to shoot his

“enemy's,” and drug distribution. He also references “splattering brains” of “snitches.”

74. Another video is titled “Zero to 1000,” posted on 5/28/15, available at <https://www.youtube.com/watch?v=w2YGpzMsFg8>. W. PEGUERO and A. PEGUERO both appear in the video as well. A. RODRIGUEZ discusses shooting people and selling narcotics in this video as well. A. RODRIGUEZ discusses having hitters and also mentions that this is “King’s World.” A. RODRIGUEZ also discusses shooting people in the face and says he’s a “DDP Killer,” which is a reference to the Dominicans Don’t Play street gang.

75. Another video is titled “Chronicles,” posted on 9/16/26, available at <https://www.youtube.com/watch?v=8R4bctjRCi4>. The first screen shot shows A. RODRIGUEZ doing the LATIN KINGS hand sign with D. LARA. A. RODRIGUEZ discusses being shot in the back and retaliating and states “Ya’ll though I was finished,” “I’ll be down to ride, I’m talking homicide, put like 30 in the clip and let them bullets fly.” A. RODRIGUEZ also discusses being a shooter. A. RODRIGUEZ says “I’ll be banging D5K screaming fuck a DDP.”

76. A 10/9/19 recording captures A. RODRIGUEZ in the basement of 358 North Front Street, New Bedford, MA, sitting at a table packaging cocaine base for distribution. During the recording, Jorge RODRIGUEZ states “that’s four G’s right there off a six-deuce,” to which A. RODRIGUEZ replies, “that’s not bad at all.” Investigators know Jorge RODRIGUEZ to be referring to 62 grams of crack cocaine when he says six-deuce and \$4,000 dollars when he states “4gs,” which means that A. RODRIGUEZ can make \$4,000 from breaking down the sixty-two grams of cocaine into smaller quantities for street level distribution.

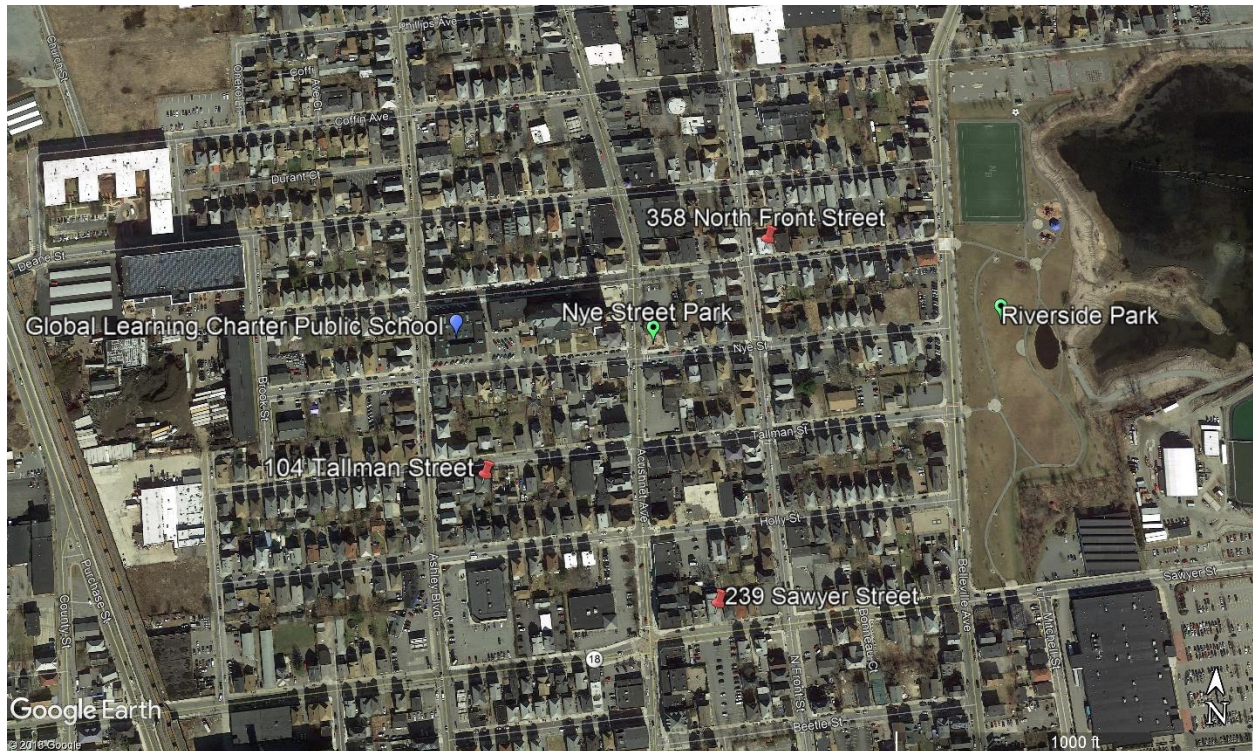
V. THE LATIN KINGS NEW BEDFORD CHAPTER

77. The New Bedford Chapter of the LATIN KINGS is an extremely well-organized and violent chapter with numerous members. This Chapter engages in a coordinated drug

conspiracy employing numerous apartment buildings located throughout the north side of New Bedford. These locations are referred to as trap houses, and are locations where the Chapter controls the premises and can distribute controlled substances with relative impunity. The New Bedford Chapter is also extremely violent and actively engages in fights, feuds, shootings, attempted murder, and open brawls with rival gangs and individuals in bad standing with the LATIN KINGS. As such, the New Bedford Chapter of the LATIN KINGS racketeering enterprise has had a significant negative effect upon the character of North New Bedford, specifically in the areas around the network of trap houses they control.

78. These New Bedford trap houses include the properties located at 104 Tallman Street, 358 North Front Street, and 239 Sawyer Street. All three trap houses are situated within 1000 feet of the Global Learning Charter Public School,⁶ located at 190 Ashley Boulevard, Riverside Park on Belleville Avenue, and the Nye Street Pocket Park at the corner of Acushnet Avenue and Nye Street. A map depicting the proximity of these three trap houses to the school and park locations follows:

⁶ According to its website, “Global Learning Charter Public School (GLCPS) is a tuition-free public charter school that currently serves 500 students in grades 5-12. Launched in 2002 as a Horace Mann charter school, GLCPS became a District charter school in 2006.” https://www.glcps.org/apps/pages/index.jsp?uREC_ID=298601&type=d&pREC_ID=688886.



79. Newspaper articles capture the frustration of local law enforcement and politicians, who have noted repeated high-level offenders being arrested for violent crimes, and ultimately released by local courts. Articles describe the prevailing sentiments of law enforcement in New Bedford, who have noted the numerous offenses being committed by those on pretrial release, and the over 220 fatal overdoses in Bristol County during 2017. See Judges Under Fire on SouthCoast, June 30, 2018, New Bedford Standard-Times, available at <https://www.southcoasttoday.com/news/20180630/judges-under-fire-on-southcoast>.

80. After the release of a particular violent LATIN KINGS member on a low bail, despite being on pretrial release for another offense, the Mayor noted his frustration in an interview with a local media outlet:

“The continued practice of district court judges releasing violent defendants on limited bail is deeply troubling,” said Mayor Mitchell. “It has compromised the safety of our city, negated the hard work of our police officers, and undermined the public’s respect for the state judicial system. It underscores the need for the appointment of judges who have more than a passing connection to Greater New Bedford, and for heightened media

scrutiny of district court proceedings. The doors of the system must be thrown open to the daylight.”

See New Bedford Police: Low Bail for Convicted Killer in Robbery Case, WBSM, available at <https://wbsm.com/new-bedford-police-low-bail-for-convicted-killer-in-robbery-case>.

81. Through repeated leniency, access to large amounts of cash generated by the lucrative drug trade that the LATIN KINGS controls in New Bedford and a demonstrated pattern of intimidating those who provide information to law enforcement, the New Bedford LATIN KINGS Chapter has been able to foster a palpable climate of fear on the north side of New Bedford. This has most recently manifested itself in a series of shootings with rival gangs over the Summer and Fall of 2019, culminating in the murder of a LATIN KINGS probationary member in October 2019.

82. At the site of the murder, the LATIN KINGS marked their intention to murder those responsible for killing the probationary member, who I will refer to as P.C.. Multiple indications of “GDK,” meaning Gangster Disciple Killer, were observed at the crime scene, and photographed by a local newspaper, which reported on the gang connection to the murder. See Signs of Gang Activity Surround New Bedford Teen’s Slaying, New Bedford Standard Times, Oct. 24, 2019, available at <https://www.southcoasttoday.com/news/20191024/signs-of-gang-activity-surround-new-bedford-teens-slaying>. Images accompanying the newspaper story follow:



83. This gang war has played out largely in the public eye and on social media and YouTube, with LATIN KINGS members issuing express threats to shoot and kill rival gang members over the internet. This investigation has revealed that the recent violence is associated with the expansion of the LATIN KINGS controlled drug network to other parts of the city and their encroachment upon the turf of rival gangs including the Gangster Disciples and Monte Park.

84. Recent newspaper articles have chronicled the gang activity and noted that it has raised concern for parents in the high school, even causing after-school activities to be cancelled due to fears of gang violence. See Signs Of Gang Activity Surround New Bedford Teen's Slaying, The Standard-Times, Oct. 24, 2019, available at

<https://www.southcoasttoday.com/news/20191024/signs-of-gang-activity-surround-new-bedford->

[teens-slaying](#); and see Keith Middle Cancels After-School Programs After Parents Raise Concerns, The Standard-Times, Oc. 26, 2019, available at <https://www.southcoasttoday.com/news/20191025/keith-middle-cancels-after-school-programs-after-parents-raise-concerns>. In short, the racketeering activity of the New Bedford Chapter has created an environment and culture of addiction, violence and lawlessness on New Bedford's north side that is directly attributable to the LATIN KINGS enterprise.

85. The following individuals have been identified as being associated with the New Bedford Chapter of the LATIN KINGS.

Jose RODRIGUEZ, a/k/a "KING STUTTER"

86. Jose RODRIGUEZ is the current Inca for the New Bedford Chapter of the LATIN KINGS, and is the brother of Jorge RODRIGUEZ and VARGAS. Jose RODRIGUEZ's role and membership in the LATIN KINGS have been confirmed by numerous recordings where he is captured discussing LATIN KINGS business and affairs, on court-authorized interceptions with other LATIN KINGS members discussing LATIN KINGS affairs and activity, presence at meetings and gatherings with other LATIN KINGS members, and on social media where he has made postings of LATIN KINGS signs, symbols and phraseology and depicted in pictures with other LATIN KINGS members.

87. An 8/3/19 recording captures CW-9 and Jorge RODRIGUEZ bringing cocaine base to Jose RODRIGUEZ. The recording depicts CW-9 and Jorge RODRIGUEZ walking from 358 North Front Street, Apartment 1S, to 238 Davis Street to retrieve cocaine base. Once they retrieve the cocaine base, CW-9 and Jorge RODRIGUEZ walk to 239 Sawyer Street. Once they enter the premises, they go up the stairs to the second floor into Unit 2N and provide the cocaine base to Jose RODRIGUEZ. Later during the recording, while at 235 Sawyer Street, New

Bedford, MA, Jorge RODRIGUEZ instructs SANTIAGO-TORRES and Jose VASQUEZ to use the front door of 239 Sawyer Street, and that LATIN KINGS members should use the backdoor of the residence for drug distribution in order to separate themselves from the drug transactions taking place in the backyard. Jorge RODRIGUEZ explains that police would need proof of which specific unit SANTIAGO-TORRES and Jose VASQUEZ reside in order to raid their location.

Orlando SANTIAGO-TORRES, a/k/a “KING LANDY”

88. SANTIAGO-TORRES is the current Cacique of the New Bedford Chapter of the LATIN KINGS. SANTIAGO-TORRES’ role and membership in the LATIN KINGS have been confirmed by numerous recordings where he is present during discussion of LATIN KINGS business and affairs, on court-authorized interceptions with other LATIN KINGS members discussing LATIN KINGS affairs and drug distribution, on social media where he has made postings with of LATIN KINGS signs, symbols and phraseology and posted pictures with other LATIN KINGS members, and presence at meetings and gatherings with other LATIN KINGS members. SANTIAGO-TORRES is also featured in a number of YouTube videos with other members of the New Bedford Chapter depicting him holding firearms, wearing gang colors, and flashing gang signs.

89. On 10/30/19, SANTIAGO-TORRES was convicted of witness intimidation in New Bedford District Court, and placed on one year of probation (Docket No. 1833CR004731).

The report authored by the Massachusetts Court Officers for this incident reads as follows:

On August 29, 2018 at approximately 9:40am I, (Assistant Chief Court Officer RC) had just finished a[n] exterior perimeter patrol with Court Officer CC. A few minutes later a gentleman later identified as Orlando Santiago-Torres entered the screening area and stated, "Yo.you guys aren't going to do anything? That guy just came running at me and you guys didn't do anything." I stated, "Sir, I have no idea what you're talking

about and If I had observed anything like that I would've intervened." It was at this time Mr. Santiago-Torres then left the screening area and proceeded into the main hallway with party later identified as J.P.M.

I then observed the other party involved in the incident who was later identified as [Victim 36] who appeared to be upset. I asked [Victim 36] if he was just involved in an altercation with anyone outside of the building. [Victim 36] stated, "That kid just threatened to fucking stab me". I asked [Victim 36] to calm down and come speak with me and explain what happened. [Victim 36] stated, "I saw a kid in a red shirt looking inside my vehicle as I was walking outside." The individual in the red shirt was identified as J.P.M. [Victim 36] stated that as he yelled at the individual near his vehicle the "kid in the red shirt" turned and replied, "I'll stab you right here nigga." [Victim 36] then responded to the individual with "If you're going to fucking stab then do it in front of everyone."

I then approached the wife of [Victim 36], ([Victim 37]) and asked if she observed anything that had transpired during the altercation and she stated, "Yes." [Victim 37] stated she was standing on the sidewalk and observed an argument between her husband and a party in a red shirt. It was at this time an individual known to both [Victim 36] and [Victim 37] as "Orlando" stated, "You know I know where you live" to [Victim 36]. It was at this time Orlando approached [Victim 37] and stated, "Tell your husband to keep his fucking mouth shut in court." I asked [Victim 36] how he and his wife are familiar with the two individuals and [Victim 36] stated that he is a victim in a case where Orlando Santiago-Torres was arrested for robbing him.

90. The robbery for which Victim 36 was involved took place on 10/9/17, in Dartmouth, MA. According to Dartmouth Police report # 17-404, officers responded to a garage for a breaking and entering where dirt bikes were stolen from Victim 36. Officers located the suspect vehicle and found SANTIAGO-TORRES, and two LATIN KINGS associates, B.M., and R.K. in the vehicle. SANTIAGO-TORRES was operating the vehicle. Officers located two of the three stolen dirt bikes nearby. For reasons not disclosed by the docket, the case was dismissed on 10/30/19 upon the defendant's motion (Docket No. 1733CR005688). Victim 36's address is stated on the court papers.

Jeremia MEDINA, a/k/a "KING SWEEPY"

91. MEDINA is the current Enforcer of the New Bedford Chapter of the LATIN KINGS. MEDINA's role and membership in the LATIN KINGS have been confirmed by

numerous recordings where he is present during discussion of LATIN KINGS business and affairs, on court-authorized interceptions with other LATIN KINGS members discussing LATIN KINGS affairs and drug distribution, presence at meetings and gatherings with other LATIN KINGS members.

Michael COTTO, a/k/a “KING GORDO”

92. COTTO is a member of the New Bedford Chapter and former Eastern Massachusetts Regional Officer for the LATIN KINGS. COTTO’s role and membership in the LATIN KINGS have been confirmed by numerous recordings where he is captured discussing LATIN KINGS business and affairs, social media postings depicting LATIN KINGS symbols, signs and statements, and presence at meetings and gatherings with other LATIN KINGS members. Furthermore, COTTO is also featured on numerous YouTube videos with other members of the New Bedford Chapter posted by LATIN KINGS New Bedford Chapter member Juan FIGUEROA, a/k/a KING PUN, where COTTO can be observed holding money, flashing firearms and gang signs, and generally dancing to music with lyrics that discuss LATIN KINGS members shooting rival gangs.

93. An 8/21/18 interception captures FIGUEROA discussing narcotics distribution with COTTO (Session 2730). During the call, FIGUEROA and COTTO discuss selling narcotics, weighing narcotics, and saving up the cash.

94. An 8/21/18 interception captures FIGUEROA and COTTO discussing police being outside the trap house. FIGUEROA informs COTTO about the police presence, and COTTO inquires if “the work is stashed up?” and then instructs FIGUEROA to “stash it somewhere good.”

95. An 8/21/18 interception captures FIGUEROA and COTTO discussing police

being outside the trap house. FIGUEROA informs COTTO that it was the gang unit who was outside, and that FIGUEROA stashed the work in the closet. COTTO instructs FIGUEROA to wait an hour and get the work and stash it in the roof hallway so that police will not find anything inside the house.

96. An 8/21/18 interception captures FIGUEROA discussing narcotics distribution with COTTO. During the call, FIGUEROA and COTTO discuss selling narcotics, and COTTO instructs FIGUEROA to give COTTO's cousin 6 halves, which investigators know to mean a specific street-level distribution amount of cocaine base.

97. An 8/27/18 interception captures FIGUEROA and COTTO discussing a recent shooting. COTTO informs FIGUEROA that someone got shot, and that there was a second retaliation between the gang members. FIGUEROA then bemoans the fact that this happens when he leaves, and that FIGUEROA would like to participate in some of the violent activity.

98. A 6/4/19 recording captures COTTO meeting with LIBERATO and LOPEZ at 358 North Front Street, New Bedford, MA, in the first floor hallway, a common area of the building. During the meeting, LIBERATO confronts COTTO about owing \$5,000 to Jeremia MEDINA, a/k/a KING SWEEPY, and \$3,000 to GV, and an unknown amount to Jorge RODRIGUEZ. CW-9 knows these debts to be in relation to drugs that were provided to COTTO on consignment that he had not then repaid. COTTO states he owes GV \$2,200. During this recording LIBERATO asks CW-9 if anyone is going to GV's hearing, which investigators know to be in relation to a recent drug arrest. CW-9 responds no because GV had a green light on him before, and GV had accused Jorge RODRIGUEZ and CW-9 of being informants.

Luis MENDEZ, a/k/a "KING PRIMO

99. MENDEZ is a current member of the New Bedford Chapter of the LATIN

KINGS, and has historically held various leadership positions. MENDEZ's role and membership in the LATIN KINGS have been confirmed by recordings where he is captured discussing LATIN KINGS business and affairs, on court-authorized interceptions with other LATIN KINGS members discussing LATIN KINGS affairs and activity. MENDEZ is also featured in a YouTube video with other members of the New Bedford Chapter depicting her wearing gang colors, and flashing gang signs.

100. MENDEZ is currently detained for a federal drug offense, pending in the U.S. District Court for the District of Massachusetts. MENDEZ also has an open case related to a May 2018 shooting incident described later in this document.

Juan FIGUEROA, a/k/a "KING PUN"

101. FIGUEROA is a current member of the New Bedford Chapter of the LATIN KINGS and former member of the Devon Street Kings Chapter. FIGUEROA's membership in the LATIN KINGS has been confirmed by numerous recordings where he is captured discussing LATIN KINGS business and affairs, on court-authorized interceptions with other members discussing LATIN KINGS affairs and activity, presence at meetings and gatherings with other LATIN KINGS members, and on social media where he has made postings of LATIN KINGS signs, symbols and phraseology and posted pictures depicting him with other LATIN KINGS members. FIGUEROA also is featured in numerous rap videos under the name, ALMIGHTY KING PUN, where he discusses various LATIN KINGS racketeering activity. Those music videos are discussed in detail below.

Tanairy RUIZ, a/k/a "QUEEN TANAIKY"

102. RUIZ is a current member of the New Bedford Chapter of the LATIN KINGS. RUIZ's membership in the LATIN KINGS has been confirmed by numerous recordings where

she is present during discussion of LATIN KINGS business and affairs, presence at meetings and gatherings with other LATIN KINGS members, and on social media where she has made postings of LATIN KINGS signs, symbols and phraseology and posted pictures depicting her with other LATIN KINGS members. RUIZ is also featured in a number of YouTube videos with other members of the New Bedford Chapter depicting her wearing gang colors, and flashing gang signs.

Issac FELIX-RIVERA, a/k/a “KING IZZY”

103. FELIX-RIVERA is a current member of the New Bedford Chapter of the LATIN KINGS. FELIX-RIVERA’s membership in the LATIN KINGS has been confirmed by numerous recordings where he is present during discussion of LATIN KINGS business and affairs, on court-authorized interceptions with other LATIN KINGS members discussing LATIN KINGS affairs and drug distribution, presence at meetings and gatherings with other LATIN KINGS members.

Ines LUGO, a/k/a “QUEEN CHINA”

104. LUGO is the current Secretary for the New Bedford Chapter of the LATIN KINGS. LUGO’s role and membership in the LATIN KINGS have been confirmed by recordings where she is present during discussion of LATIN KINGS business and affairs, presence at meetings and gatherings with other LATIN KINGS members, and on social media where she has made postings of LATIN KINGS signs, symbols and phraseology and posted pictures depicting her with other LATIN KINGS members. LUGO is also featured in a number of YouTube videos with other members of the New Bedford Chapter depicting her wearing gang colors, and flashing gang signs.

105. Investigators obtained a series of Facebook messages from 1/28/19 related to the

planned beating of an individual I will refer to as R, who had posted photographs of himself throwing up LATIN KINGS gang signs, though he is not affiliated with the gang. The members of the chat group included LUGO, Jose VASQUEZ, and SANTIAGO-TORRES. In the text messages, the group discusses the basis for the beating, and setting a time frame on it being “ASAP.” In the chat, LUGO tells the other members, “U bros better eat on them especially roger for knowing how we roll and still letting a bitch ass nigga tho down our krown.. I knew that lol bitch ass niggas was no good wanna see whose guns defend him now.” Investigators believe that the term “eat” refers to inflicting physical violence, and has been used by other LATIN KINGS members in that regard.

106. On 8/24/19, a recording captured LUGO delivering 62 grams of cocaine base to Jose RODRIGUEZ at 239 Sawyer Street, New Bedford, MA.

107. LUGO has a criminal record in Florida for controlled substance offenses, shoplifting, and dealing in stolen property.

Tyson JORGE, a/k/a “KING MUSIC”

108. JORGE is a current member of the New Bedford Chapter of the LATIN KINGS. JORGE’s membership in the LATIN KINGS has been confirmed by numerous recordings where he is present during discussion of LATIN KINGS business and affairs, on social media where he has made postings of LATIN KINGS signs, symbols and phraseology and posted pictures with other LATIN KINGS members, and presence at meetings and gatherings with other LATIN KINGS members. JORGE is also featured in at least one YouTube video with other members of the New Bedford Chapter depicting him wearing gang colors, and flashing gang signs.

Xavier VALENTIN-SOTO, a/k/a “KING X”

109. VALENTIN-SOTO is a member and the former Cacique of the New Bedford Chapter of the LATIN KINGS. VALENTIN-SOTO's role and membership in the LATIN KINGS have been confirmed by social media where he has made postings with LATIN KINGS signs, symbols and phraseology and posted pictures with other LATIN KINGS members, and presence at meetings and gatherings with other LATIN KINGS members.

110. A 3/29/19 recording captures CW-3 purchasing 43 grams of cocaine from VALENTIN-SOTO. During the video, the CW-3 proceeds to 358 North Front Street, Apartment 1S, New Bedford, MA and observed CW-9, Jorge RODRIGUEZ, VALENTIN-SOTO, and RUIZ. Approximately 300 grams of cocaine is visible on a plate in the kitchen. VALENTIN-SOTO informs CW-3 that they need to travel to his house to get the cocaine. They traveled to VALENTIN-SOTO's residence at 487 North Front Street, First Floor, New Bedford, MA, in CW-3's vehicle and went inside. VALENTIN-SOTO entered and then quickly exited his bedroom and came into the kitchen with 62 grams of cocaine. VALENTIN-SOTO broke off approximately 1.5 ounces and gave it to CW-3 for \$1,800. VALENTIN-SOTO then informed CW-3 that he/she could get the full 2 ounces the next time for \$2,500.

111. A 4/9/19 recording captures CW-3 purchasing approximately 62 grams of cocaine from VALENTIN-SOTO. CW-3 travelled to VALENTIN-SOTO's address at 487 North Front Street, First Floor, New Bedford, MA, and VALENTIN-SOTO asked what CW-3 wanted. The CW responded that he/she brought \$2,500 in order to purchase 62 grams of cocaine. VALENTIN-SOTO then went to another room as CW-3 waited in the kitchen. VALENTIN-SOTO returned to the kitchen and weighed a plastic bag containing the cocaine on a scale next to the sink. VALENTIN-SOTO then gave CW-3 the 62 grams of cocaine in exchange for \$2,500.

112. A 5/6/19 recording captured CW-3 purchasing 63 grams of "soft" for \$2,500 from

VALENTIN-SOTO. During the conversation, VALENTIN-SOTO asked what the CW wanted and stated that he had no time to make “hard,” which is cocaine base.

Taliyah BARBOZA, a/k/a “QUEEN TALIYAH”

113. BARBOZA is a member of the New Bedford Chapter of the LATIN KINGS. BARBOZA’s membership in the LATIN KINGS has been confirmed by recordings where she is present during discussion of LATIN KINGS business and affairs, presence at meetings and gatherings with other LATIN KINGS members, and on social media where she has made postings of LATIN KINGS signs, symbols and phraseology and posted pictures depicting her with other LATIN KINGS members. BARBOZA is also featured in a YouTube video with other members of the New Bedford Chapter depicting her wearing gang colors, and flashing gang signs.

114. A 2/4/19 recording captures Jorge RODRIGUEZ, MENDEZ, BARBOZA, and VALENTIN-SOTO discussing the beating of an individual I will refer to as Victim 24. Jorge RODRIGUEZ states Victim 24 is in Providence Hospital and has three broken ribs and a collapsed lung. MENDEZ and BARBOZA state that they were present for the assault and BARBOZA states that Jorge RODRIGUEZ told the group to eat and they began assaulting Victim 24. BARBOZA indicated that she thought Jorge RODRIGUEZ meant her too, and that the other LATIN KINGS members were holding her back.

Raekwan PARIS, a/k/a “KING DEBO”

115. PARIS is a current member of the New Bedford Chapter of the LATIN KINGS. PARIS’s membership in the LATIN KINGS has been confirmed by a recording discussing LATIN KINGS racketeering activity, references by other LATIN KINGS members to PARIS being a member of the LATIN KINGS, and on social media where he has made postings of

LATIN KINGS signs, symbols and phraseology and posted pictures depicting him with other LATIN KINGS members.

Roberto VARGAS, a/k/a “KING ROYALTY”

116. VARGAS is a current member of the New Bedford Chapter of the LATIN KINGS. VARGAS’s membership in the LATIN KINGS has been confirmed by numerous recordings where he is captured discussing LATIN KINGS business and affairs, on court-authorized interceptions with other LATIN KINGS members, and references by other members to VARGAS being a member of the LATIN KINGS. Furthermore, VARGAS is also featured on numerous YouTube videos, where VARGAS can be observed holding money, and flashing gang signs.

Jose VASQUEZ, a/k/a “KING FEARLESS”

117. Jose VASQUEZ is a former member of the New Bedford Chapter of the LATIN KINGS, and a former Enforcer the New Bedford Chapter. Jose VASQUEZ’s role and membership in the LATIN KINGS were previously confirmed by numerous recordings where he is captured discussing LATIN KINGS business and affairs, and references by other members to Jose VASQUEZ being a member of the LATIN KINGS, and on social media where he is depicted with other LATIN KINGS members. Furthermore, Jose VASQUEZ is also featured in numerous YouTube videos with other members of the New Bedford Chapter depicting him flashing gang signs. As discussed below, in October 2019, Jose VASQUEZ was violently terminated from the LATIN KINGS for violating a gang law forbidding fornication with the girlfriend of another LATIN KINGS member.

Josue CARRASQUILLO, a/k/a “KING PLAYBOY”

118. CARRASQUILLO is a current member of the New Bedford Chapter of the

LATIN KINGS. CARRASQUILLO's membership in the LATIN KINGS has been confirmed by numerous recordings where he is captured discussing LATIN KINGS business and affairs, and references by other members to CARRASQUILLO being a member of the LATIN KINGS, and on social media where he has made postings of LATIN KINGS signs, symbols and phraseology and posted pictures depicting him with other LATIN KINGS members.

Furthermore, CARRASQUILLO is also featured in YouTube videos with other members of the New Bedford Chapter depicting him wearing gang colors and flashing gang signs.

Shelton JOHNSON, a/k/a "KING SHELLS"

119. JOHNSON is a current member of the New Bedford Chapter of the LATIN KINGS. JOHNSON's membership in the LATIN KINGS has been confirmed by numerous recordings where he is captured discussing LATIN KINGS business and affairs, and references by other members to JOHNSON being a member of the LATIN KINGS, and on social media where he has made postings of LATIN KINGS signs, symbols and phraseology and posted pictures depicting him with other LATIN KINGS members.

120. On 2/14/18, a victim reported to police that he had been robbed of his wallet and money at an apartment at 149 Tinkham Street, New Bedford, MA. The victim noted that he was assaulted by black male wearing dark clothing, later identified to be JOHNSON. The victim informed police that a total of six people assaulted him and stole approximately \$600 in currency from his wallet. The victim reported that JOHNSON punched and kicked him, and that another LATIN KINGS member, Hector Torres, punched him and pushed him out of the apartment after they had stolen the cash from his wallet. JOHNSON then threw the empty wallet to the victim. Officers noted that they had recently executed a search warrant related to a narcotics investigation at the 149 Tinkham Street address on 2/5/18. Officers went to the apartment and

identified JOHNSON, and Hector Torres, a/k/a King Chino. Torres, JOHNSON and four others were placed under arrest, and police located crack cocaine on the floor near Torres. JOHNSON pled guilty to the reduced charge of larceny from a person and assault and battery by means of dangerous weapon on 5/14/18, (Docket 1833CR000801), and was sentenced to 1 year in the house of correction.

Luis SANTIAGO, a/k/a “KING TINY”

121. SANTIAGO is a current member of the New Bedford Chapter of the LATIN KINGS. SANTIAGO’s membership in the LATIN KINGS has been confirmed by references by other LATIN KINGS members to SANTIAGO being a member of the LATIN KINGS, and on social media where he has made postings of LATIN KINGS signs, symbols and phraseology and posted pictures depicting him with other LATIN KINGS members. Furthermore, SANTIAGO is also featured in a YouTube video with other members of the New Bedford Chapter with members holding firearms, wearing gang colors and flashing gang signs.

Kevin GUADALUPE, a/k/a “KING MILLY”

122. GUADALUPE is a current member of the New Bedford Chapter of the LATIN KINGS. GUADALUPE’s membership in the LATIN KINGS has been confirmed by recordings where he is present when LATIN KINGS business and affairs are discussed, references by other members to GUADALUPE being a member of the LATIN KINGS, and on social media where he is depicted in photographs throwing up gang signs with other LATIN KINGS members.

123. According to New Bedford Police report #19-7006, on 6/20/19, a convenience store on Purchase Street, New Bedford, MA, was robbed by two men carrying guns. CW-9 stated that CARRASQUILLO and GUADALUPE committed the robbery with the acquiescence of the store owner for insurance proceeds. This robbery was captured on video, and the clerk, who was

not aware of the scam, was struck by the robbers. CW-9 learned about this robbery from CARRASQUILLO and GUADALUPE who told CW-9 about it. CW-9 believes that this robbery was arranged with the owner by another LATIN KINGS member, FNU LNU, a/k/a Pica.

Natanael VELAZQUEZ, a/k/a “KING NAEL”

124. N. VELAZQUEZ is a current member of the New Bedford Chapter of the LATIN KINGS. N. VELAZQUEZ’s membership in the LATIN KINGS has been confirmed by references by other LATIN KINGS members to N. VELAZQUEZ being a member of the LATIN KINGS, and on social media where he is depicted in photographs throwing up gang signs with other LATIN KINGS members. Furthermore, N. VELAZQUEZ is also featured in a YouTube video with other members of the New Bedford Chapter depicting members wearing gang colors and flashing gang signs.

Emanuel LOPEZ-VELEZ, a/k/a “KING MANNY”

125. LOPEZ-VELEZ is a probationary member of the New Bedford Chapter of the LATIN KINGS. LOPEZ-VELEZ’s probationary membership in the LATIN KINGS has been confirmed by references by other LATIN KINGS members to LOPEZ-VELEZ being a member of the LATIN KINGS. Furthermore, LOPEZ-VELEZ is also featured in a YouTube video with other members of the New Bedford Chapter depicting members wearing gang colors and flashing gang signs.

Jayco REYES-SMITH, a/k/a “KING JAVY”

126. REYES-SMITH is a former member of the New Bedford Chapter of the LATIN KINGS, who is believed to have left the area and returned to North Carolina. REYES-SMITH’s membership is confirmed by recordings and information from CW-9 that CW-9 knew REYES-SMITH when he was in New Bedford. REYES-SMITH is believed to have left Massachusetts

following a May 2018 shooting that was caught on camera and for which he is currently in warrant status. This shooting is discussed below.

VI. OTHER CHAPTER LATIN KINGS TARGETS

Alfred NIEVES, a/k/a “KING ALFY” - Lowell

127. NIEVES is the former Inca of the Lowell Chapter, and current member of the LATIN KINGS. NIEVES’ role and membership in the LATIN KINGS have been confirmed by recordings where he is captured discussing LATIN KINGS business and affairs, presence at meetings and gatherings with other LATIN KINGS members, and on social media where he has made postings of LATIN KINGS signs, symbols and phraseology and posted pictures depicting him with other LATIN KINGS members.

Israel RODRIGUEZ, a/k/a “KING IMPERIAL” – North Shore

128. I. RODRIGUEZ is the Inca of the North Shore Chapter of the LATIN KINGS. I. RODRIGUEZ’s role and membership in the LATIN KINGS have been confirmed by recordings, self-admissions on court-authorized interceptions, and recordings where he is referenced by other members as a member of the LATIN KINGS.

Jesus DIAZ, a/k/a “KING KIKO” – North Shore

129. J. DIAZ is a member of the North Shore Chapter of the LATIN KINGS. J. DIAZ’ role and membership in the LATIN KINGS have been confirmed by recordings obtained during controlled buys.

Henry CARIBE, a/k/a “KING 40CAL” – North Shore

130. CARIBE is a member of the North Shore Chapter of the LATIN KINGS. CARIBE’s role and membership in the LATIN KINGS have been confirmed by recordings obtained during controlled buys.

Alexis VELASQUEZ, a/k/a “KING BOOBOO” – MSB

131. A. VELASQUEZ is the current Inca of the Morton Street Bricks Chapter of the LATIN KINGS. Various pictures, recordings, and references by other members confirm him as a member of the LATIN KINGS.

Angel CALDERON, a/k/a “KING BAM” - MSB

132. CALDERON is a current member of the Morton Street Bricks Chapter of the LATIN KINGS. Various pictures, recordings, YouTube music videos, and references by other members confirm him to be a member of the LATIN KINGS.

Oscar PENA, a/k/a “KING O-BLOCK”

133. PENA is a current member of the Morton Street Bricks Chapter of the LATIN KINGS. Various pictures, social media posts, and references by other members confirm him as a member of the LATIN KINGS.

134. On 11/11/17, Boston Police were patrolling the Gallivan Boulevard area of Dorchester in response to an Officer Safety and Awareness bulletin advising that Heath Street Gang members were seeking retaliation against D5K gang members for a dispute. Officers observed a Jeep committing traffic violations and conducted a car stop. CALDERON was in the driver’s seat and Oscar PENA was seated in the rear passenger’s seat. Following a brief inquiry where it was determined that neither CALDERON nor Oscar PENA had a valid license, all occupants were removed from the Jeep. One gram of cocaine and 13 grams of heroin were recovered from the driver’s side rear door pocket.

135. A 11/12/18 recording captured CW-3 purchasing 40 grams of suspected heroin from PENA.

136. A 12/6/18 recording captured CW-3 purchasing 30 grams of suspected heroin

from PENA.

Alvin MOJICA, a/k/a “KING HUMBLE” – Worcester, Inca

137. MOJICA is the current Inca of the Worcester Chapter of the LATIN KINGS. Various references by other members of the LATIN KINGS confirm his membership. MOJICA distributes controlled substances in furtherance of the LATIN KINGS.

Sophia VELASQUEZ, [REDACTED]

Dairon RIVERA, a/k/a “KING MAFIA” – Fitchburg

138. S. VELASQUEZ and D. RIVERA are members of the Fitchburg Chapter of the LATIN KINGS. Their membership is confirmed by recordings made during controlled buys of controlled substances. They distribute fentanyl on behalf of the LATIN KINGS.

Hector ADORNO, a/k/a “KING GORDO” – Springfield

139. ADORNO is a member of the Springfield Chapter of the LATIN KINGS. His membership is confirmed by historical police reports and records. ADORNO was found to be a felon in possession of ammunition taken from a “Ghost Gun” during the course of this investigation.

Jonathan CASSIANO, a/k/a “KING LEGEND” – Springfield

140. CASSIANO is a member of the Springfield Chapter of the LATIN KINGS. His membership is confirmed by historical police reports and records. CASSIANO was found to be a felon in possession of ammunition taken from a “Ghost Gun” during the course of this investigation.

Antoine GOODSON and Derek SOUTHWORTH

141. GOODSON and SOUTHWORTH are firearms suppliers to the LATIN KINGS.

PATTERN OF ASSOCIATED RACKETEERING ACTIVITY

142. For the past four years, the investigation has generated numerous recordings and interceptions, which substantiate the extensive racketeering activities of the LATIN KINGS throughout Massachusetts and the East Coast. This racketeering activity committed by the enterprise includes conspiracies to murder orchestrated by the height of the East Coast Team Leadership, including CECCHETELLI, down to the individual members tasked with maintaining and extending the sphere of LATIN KINGS influence through shootings, drug dealing, robberies, and witness intimidation.

143. In order to organize the extensive racketeering activity, this affidavit sets forth the activity by tier of the targets involved, i.e., activity that involved the East Coast Team directing or accomplishing the racketeering activity, followed by activity involving the Massachusetts State team directing or accomplishing the racketeering activity, followed by individual chapters.

EAST COAST TEAM SELECTED RACKETEERING ACTIVITY

I. Conspiracy to Murder Victim 21 and Victim 22 (Involving CECCHETELLI, Jorge RODRIGUEZ, MARRERO, E. ORTIZ, VEGA, SIERRA, PEGUERO-COLON)

144. This investigation documented a conspiracy to murder formed by CECCHETELLI and other members of the LATIN KINGS leadership that targeted two LATIN KINGS members in bad standing for disrespecting CECCHETELLI's leadership. I will refer to the targeted individuals as Victim 21, and Victim 22.

145. In April 2018, PEGUERO-COLON disseminated a series of emails concerning the LATIN KINGS. CW-3 received these emails and provided them to law enforcement. This series of emails also identified individuals who were believed to be informants, and other persons in bad standing with the LATIN KINGS. Of note, Victim 21 is listed in a spreadsheet sent by PEGUERO-COLON to CW-3 on 04/22/18 identifying individuals who have been

identified as being in bad standing with the LATIN KINGS. The spreadsheet identified Victim 21 by name, and indicates “Treason” as the basis for excommunication and that the verification of this basis was provided by “M,” referring to CECCHETELLI.

146. On 12/3/18, CECCHETELLI sent CW-9 a screenshot of an exchange between Victim 21 and Victim 22 identifying CECCHETELLI as a snitch and claiming to have “paperwork” proving it. Victim 21 sent the same message to other LATIN KINGS.

147. On 12/5/18, CECCHETELLI ordered CW-9 to “smash,” i.e., assault Victim 21 for claiming CECCHETELLI is a snitch. In a follow-up conversation CECCHETELLI informed CW-9, “[Victim 21] is having his party tonight.” CW-9 took this to mean that Victim 21 was to be assaulted that night.

148. On 12/7/18, CECCHETELLI informed CW-9 that Victim 21 is hiding in Springfield with his roommate and that Victim 22 is hanging out in Waterbury, CT, at a bar on South Main Street. CECCHETELLI wrote, “I have to find a permanent solution for [Victim 22]. We can’t even go old school and merk the fucker because the whole world and every fed in it knows he’s my arch-enemy. I’m gonna have to somehow expose him....Fuck it, in honor of Al Capone we will reenact the Valentine’s day massacre.” “Merk” is street slang for murder.

149. On 12/8/18, CW-9 reported that CECCHETELLI met with Jorge RODRIGUEZ, the State Team Enforcer at the time, to discuss the creation of a “hit squad.”

150. On 12/21/18, PEGUERO-COLON met with CW-9 in the woods and asked CW-9 to get him a stolen car so that he could drive to Waterbury, CT, and shoot up the bar frequented by Victim 22.

151. A 1/19/19 message from CECCHETELLI to CW-9 included the following, “since [Victim 21] hit me up and wants to make peace I had Clumsy call him and set up a meeting. The

conditions were that he cuts the shit, then Saturday we will meet, we will give [Victim 21] a promise that he can live in peace and he will make a video saying that paperwork was bogus, that [Victim 22] and them are frauds etc. Then [Victim 21] will disappear. He doesn't know that part of course." I believe in this communication, CECCHETELLI is stating that Victim 21 will be lured to a meeting where he will be promised that no retaliation will take place, and that this meeting will be setup by MARRERO (a/k/a "King Clumsy"). Once there, Victim 21 will create a video retracting his prior statements about CECCHETELLI's loyalty. After this, Victim 21 will be murdered, which Victim 21 will not know about beforehand.

152. A 1/28/19 recording between CECCHETELLI, CW-9 and Jorge RODRIGUEZ captures CECCHETELLI stating that he would have "taken care of" Victim 21, i.e., murdered him, if it were not for the fact that CECCHETELLI needs a video of Victim 21 retracting his claims that CECCHETELLI is a snitch.

153. On 1/30/19, law enforcement had Victim 21 arrested on a probation warrant and held in custody to prevent him from arriving at the meeting with CECCHETELLI.

154. On 2/2/19, CECCHETELLI sent a message to CW-9 saying that he wants "black beads" to kill Victim 22. CW-9 knows that "black beads" are designated shooters, LATIN KINGS version of an assassin.

155. On 2/8/19, E. ORTIZ called CW-9 to report that she is "going to Connecticut to check on a bunch of things because no one knows [her] car." E. ORTIZ believes that she will be able to locate Victim 22.

156. On 3/1/19, VEGA called CW-9 to report that "we went to Waterbury. We called [Victim 21] out. [Victim 21] be like I be there in ten minutes. Ain't nobody scared. We were there for like an hour. Nigga never showed up Bro." VEGA continued, "We went to his house.

Nigga, we was acting nasty all last week... We went to his house and told him to come outside.” Later in the conversation VEGA stated, “We went to the bar. We was like, ‘oh what up?’ Nigga was scared, right. His man was like, ‘oh what up? Yo, yall came from New Haven? What up? Oh, yall know my nigga [Victim 21] then.”

157. On 4/26/19, Waterbury, CT, Police reported that a vehicle used by Victim 22 was shot several times. Photographs of the scene depict bullet holes in the vehicle. Investigators located Victim 22’s identification and a gold chain in the vehicle. Investigators spoke to Victim 22’s girlfriend who said that Victim 22 had come home bleeding through his shirt, but was no longer there. Victim 22 has not been seen or heard from since this incident.

158. On 5/26/19, a recording was made where a LATIN KINGS member discusses the efforts to locate and kill Victim 22. Later that day E. ORTIZ tells CW-9 that “[Victim 22] got hit.”

II. Accessory After the Fact to Murder

159. On 10/7/19, CECCHETELLI sent CW-9 messages concerning JOEL FRANCISCO, a/k/a “KING CASPER” who was wanted for murder by Rhode Island authorities. FRANCISCO was sentenced to life in prison in 2005 following a federal conviction for distributing cocaine base. FRANCISCO was released from custody under the Fair Sentencing Act in February 2019, and is currently on supervised release. FRANCISCO was re-arrested in July 2019 on charges of domestic violence and released. On 10/2/19, FRANCISCO became a person of interest in a homicide on Federal Hill in Providence, Rhode Island, and a warrant was sought for his arrest. CECCHETELLI told CW-9 that they need to help FRANCISCO get to Texas where he will cross into Mexico with the assistance of LATIN KINGS members located

there. Law enforcement later arrested FRANCISCO for this murder.⁷

160. A 9/4/19 recording captures FRANCISCO and Erik THOMAS purchasing 186 grams of cocaine base from Jorge RODRIGUEZ and CW-9.

MASSACHUSETTS STATE TEAM SELECTED RACKETEERING ACTIVITY

I. Conspiracy to Murder Angel ROLDAN, a/k/a “KING BIG A” (CECCHETELLI, E. ORTIZ, CALDERON, Jorge RODRIGUEZ, LIBERATO, COTTO, PEGUERO-COLON, MARRERO, ADORNO, VEGA, ECHEVARRIA, W. PEGUERO, A. PEGUERO, VELASQUEZ)

161. In 2019, ROLDAN was brought to trial for a number of violations of LATIN KINGS law. These violations included taking money from the D5K fundo for firearms that never materialized. ROLDAN was found guilty at trial and ordered to repay various members of the LATIN KINGS. A few months later, ROLDAN had not paid back those individuals and LIBERATO issued an order to kill ROLDAN. CW-9 intervened to stop the murder, and FBI alerted ROLDAN to the threat. The various meetings and trial were recorded.

162. A 2/23/19 video recording captures CW-3, CALDERON, M. RIVERA and Jorge RODRIGUEZ discussing ROLDAN, while travelling to a LATIN KINGS State Team meeting in Springfield, MA. During the recording, M. RIVERA, CALDERON and Jorge RODRIGUEZ discuss how ROLDAN had purchased numerous firearms from the members, including 5 or 6 firearms from M. RIVERA. CALDERON states that he would kill ROLDAN for the violations: “I don't give a fuck I'm a killa, if I see that nigga imma kill this nigga, in front of your kids and all that, nephews and nieces, they're gonna witness a murder.”

⁷ See Joel Francisco being held in Texas for Federal Hill slaying, Providence Journal, Oct. 21, 2019, available at <https://www.providencejournal.com/news/20191021/joel-francisco-being-held-in-texas-for-federal-hill-slaying>

163. A 2/23/19 video recording of a LATIN KINGS State Team meeting⁸ captures CW-3, CALDERON, and Jorge RODRIGUEZ reporting to CW-9 and CECCHETELLI that ROLDAN had stolen drugs from Jorge RODRIGUEZ, robbed a pound of marijuana from CW-3 and taken money from the D5K fundo to purchase firearms that never materialized. CALDERON and M. RIVERA discuss that ROLDAN ordered a probationary member to shoot D. RIVERA, a/k/a KING MAFIA, during an argument. The probationary member drew a firearm and shot W. PEGUERO in the leg. During the conversation, in relation to a claim that a LATIN KINGS member was taking photos with Dominicans Don't Play (DDP) gang members, CECCHETELLI states: "That's a fucking king killer. You shouldn't be taking pictures with them. You should be laying them out." At the conclusion of the meeting, CECCHETELLI set a pretrial hearing for 3/16/19.

164. On 3/23/19, a video recording captures the trial of ROLDAN. During the recording E. ORTIZ convenes a Special Crown Council of herself, JE, and FNU LNU, a/k/a "Deuco" and FNU LNU, a/k/a "Gully" to hear testimony from CW-3, CALDERON, and Jorge RODRIGUEZ about the offenses. A. VELASQUEZ, COTTO, LIBERATO, LOPEZ, W. PEGUERO, A. PEGUERO, and PUGERO-COLON were among those present. At the conclusion of the hearing, E. ORTIZ found ROLDAN guilty of stealing from CW-3 and Jorge RODRIGUEZ. ROLDAN was ordered to re-pay drug debts within six months and was stripped of his position as Massachusetts State Cacique.

165. In late July 2019, ROLDAN had not paid back the money. As a result, LIBERATO issued a termination order for ROLDAN. CW-9 reported this information to FBI.

⁸ This same gathering included a peace negotiation with the Gangster Disciples discussed below.

According to CW-9, the plan was that ROLDAN was to be murdered outside of his residence in Lowell, MA. FBI immediately alerted ROLDAN to this threat. According to CW-9, LIBERATO issued the kill order and transmitted it to Jorge RODRIGUEZ for execution. Jorge RODRIGUEZ tasked CALDERON and A. VELASQUEZ with executing the order. CALDERON and A. VELASQUEZ were instructed to shoot ROLDAN as he exited his home at 22 North Street, Lowell, MA.

166. A 7/30/19 recording captured CECCHETELLI, MARRERO and CW-9 discussing the conspiracy to murder ROLDAN. CW-9, MARRERO and CECCHETELLI discussed how LIBERATO's decision in issuing the kill order was improper and influenced by CALDERON and Jorge RODRIGUEZ, who have personal animosity against ROLDAN. This 7/30/19 recording also identifies that CALDERON was ordered to complete the murder, and that CALDERON was on a GPS bracelet at the time.

167. On 8/31/19, a meeting of the Massachusetts State leadership team was held to address the termination order issued by LIBERATO and clear the air between the LATIN KINGS leadership. This meeting was recorded. In attendance for this meeting were CECCHETELLI, ROLDAN, F. LOPEZ, LIBERATO, Jorge RODRIGUEZ, MARRERO, PEGUERO-COLON, A. RODRIGUEZ, W. PEGUERO, and A. PEGUERO. The following is a draft transcript of a portion of the conversation:

CECCHETELLI: So to start from the beginning, when you hit me up and told me about that and you gave me the recording of the day they came over there, I hit up Cabeza. I asked him, "yo has there been any talk about anything like that?" He said, "yes, this morning I found out Prodigy told G to get this done, but I put a stop to it." From there we got into investigating it, looking into the whole thing. There was never any kill type shit, there was never anything like that. They were talking about um, V having brothers pop off. There was never anything said about any kill type shit or any, any, any of that. Uh...

ROLDAN: I want, I, I want to know how somebody gonna send any kill, green light, violation, I got six months. I still got a month right now. You can't send no—

CECCHETELLI: Because tomorrow's September.

ROLDAN: Yeah, September 22nd. The, yeah, you don't, like, you can't send that regardless, bro. Who, who are you to send anything? You the Inca but you gotta go, to get a green light you need a have three of them. We already established that, Trey knows that. There got to be three from the state that's, any, any green light there got to be three from the State to State.

[...]

ROLDAN: Bro, I didn't forget nothing. My memory, bro, y'all niggers think I'm chillin' but I watch everything. That's why you watching my Instagram, snap, everything like, bro is, you could call me. All this green light this, this, bro. You just jeopardized the Nation, brothers, everything. Bro, I wasn't going out like that, niggers know me. You got a gun license, you got everything, why you didn't come? Why—no disrespect to nobody here—why you didn't come, bro you got two gun safes bro, why you didn't come?

LIBERATO: Man I did go to your house, bro. And I called you, you said—and you told me there was nothing to talk about. [UI]

ROLDAN: Yeah 'cause you kept showing up, there's a green light you should've kept showing up. You the closest to me.

LIBERATO: Yeah I was, I was—

ROLDAN: No disrespect to the Nation but I would've took everybody out, bro, Trey put my camera system up, he know what it is.

PEGUERO-COLON: Yep.

ROLDAN: No disrespect, you know Trey, like that shit still work, bro.

LIBERATO: Well I was, I was—

ROLDAN: Come to me like a man, bro. Not like no, no, no little girl. Come to me like a man.

MARRERO: Hold on, wait. Wait a minute. Don't [UI]

ROLDAN: No I'm just saying, I'm just saying because he knows. He's right there you know, you sending other brothers to crash out, that's what I'm saying. That's what I'm seeing. You basically jeopardize the whole Nation because you want to do something.

168. During this exchange, CECCHETELLI attempts to minimize the significance of the order issued by LIBERATO, by claiming that there was no kill order, but does acknowledge there would have been gunfire ("There was never any kill type shit, there was never anything like that. They were talking about um, V having brothers pop off.").

169. ROLDAN continues to express the fact that if he were to be shot at then he would have killed everyone who came for him ("I would've took everybody out"). CECCHETELLI acknowledges that if Jorge RODRIGUEZ, "would have followed through with that order and sent people to Big A's, it would have been a fucking bloodbath."

170. ROLDAN also believes that LIBERATO's order "jeopardized the Nation," meaning that it placed the LATIN KINGS in a potential internal war and also exposed them to prosecution. ROLDAN also makes procedural arguments concerning the basis of the order, claiming that LIBERATO lacked the authority to issue it ("You the Inca but you gotta go, to get a green light you need a have three of them. We already established that, Trey knows that. There got to be three from the state that's, any, any green light there got to be three from the State to State"). In response, CECCHETELLI acknowledges the ability of LIBERATO, as Inca to issue such an order. The following is a draft transcript of a portion of the conversation:

CECCHETELLI: The only reason why we're mentioning it now and the only reason why, I mean to be perfectly honest, Prodigy as Inca, yeah he can make that call. He can put some brothers to do that, he can, if he feels like it was a threat or if he feels any brother was a problem, you're the Inca he can do that he can send out whatever you need to send out. Later on if you were wrong or if he did it for the wrong reasons, I'll deal with him and I'll have him address that with you, but it's not an issue on whether or not you have the

authority to do that, you do have the authority, you can do that any time. That's not a question. You're the Inca if anybody's in your state that you feel is a threat or is, is uh, in some way disrespecting or in some way violating our law you got every right to send something.

171. Later on in the meeting, ROLDAN complains that State Leadership is intruding upon local chapter business and that will expose the LATIN KINGS enterprise to prosecution.

ROLDAN states:

We could bring up all the issues everywhere. Let's put them on the table. ***We all gonna be fucking in an indictment. I'm gonna be down for a RICO. You gonna be down for a RICO. You gonna be down for a RICO. We all gonna be down.***

172. I believe that in this statement, ROLDAN is complaining that centralizing the decision-making process in such meetings reveals the scope and workings of the LATIN KINGS criminal enterprise and makes it easier for law enforcement to capture and document the racketeering conspiracy. During this statement, refers to other LATIN KINGS leaders present for the meeting and indicates that they too will be charged with racketeering.

II. Tampering and Retaliating Against Witnesses and Informants (Victim 1 on 2/12/18)

173. On 2/12/18, New Bedford Police encountered Victim 1, who was bleeding. A bystander observed Victim 1 running from North Front Street, New Bedford, MA. Victim 1 was uncooperative and would not identify his assailants, but did indicate that he was struck over the head with a bottle and stabbed with a knife. Officers observed bleeding from Victim 1's head, and hands, and there appeared to be a puncture wound to his buttocks.

174. CW-9 reported that this incident in fact was an organized LATIN KINGS attempted murder of Victim 1, because Victim 1 was believed to have cooperated with law enforcement. CW-9 reported that Jorge RODRIGUEZ ordered the termination of Victim 1 based upon the belief that he had provided information to law enforcement. CW-9 reported that

LATIN KINGS members, including COTTO, MENDEZ, CALDERON, FIGUEROA, PALACIOS, and W. PEGUERO confronted Victim 1 while he was selling crack cocaine in New Bedford and assaulted him. CW-9 observed Victim 1 running from the house with his face bloodied. According to CW-9, ROLDAN acquired paperwork⁹ confirming Victim 1's cooperation and informed Jorge RODRIGUEZ, who ordered COTTO to terminate Victim 1.

175. Victim 1 was listed in a spreadsheet attached to an email disseminated by PEGUERO-COLON. In the spreadsheet, Victim 1 was identified by first name, last name, and social media account address as excommunicated. Victim 1 was noted to be a "police collaborator." A further column indicates that this status was verified by "M," which I believe to be a reference to CECCHETELLI.

176. A 11/2/18 interception captures COTTO talking with CW-9 regarding Victim 1, and that Victim 1 is hanging out with a motorcycle club. During the call, COTTO states Victim 1 is a rat and is "no good." Another recording on 11/18/18, captures CW-9 and COTTO discussing that Victim 1 is an informant in relation to a homicide case.

177. In May 2019, Victim 1 was interviewed and confirmed that he was beaten by members of LATIN KINGS. Victim 1 identified COTTO as being involved in the beating, and stated he was hit over the head with two glasses bottles.

III. Conspiracy to Murder Victim 13

178. On 6/1/19, a recording captures a call from NIEVES from CW-9 concerning Victim 13, the son of a LATIN KINGS member who I will refer to as Victim 25. Victim 25 is a

⁹ A 11/18/18 recording captures ROLDAN, Jorge RODRIGUEZ and CW-9 discussing how ROLDAN is frequently consulted regarding obtaining paperwork on persons believed to be cooperating with law enforcement and that ROLDAN knows how to read paperwork concerning whether an individual is an informant.

ranking member of the LATIN KINGS and Victim 13 had violated LATIN KINGS law and was to be killed. Since Victim 25 was a high-ranking member, the targeting of Victim 13 for murder was the subject of much discussion, because LATIN KINGS members were reluctant to target the son of a member without explicit approval from higher authority. CW-9 exerted influence and intervened to prevent this murder from occurring.

179. During the 6/1/19 call NIEVES stated, "So shit's about to hit the fan big time bro, I'm sorry bro no disrespect to him but his son bout to get his ass rocked probably even worse." NIEVES indicated that Victim 13 had been talking bad about the LATIN KINGS and disrespecting members. Later in the call, NIEVES stated, "Like we about to light him up right now he went up he went up he went up on my enforcer with three bros with a burner that's why, that's why I'm like whatever and bro we're not uh we bout to light him up, I don't he could [UI], I don't [UI], bout to light him up like right now bro."

180. NIEVES then acknowledged Victim 25 being the father of Victim 13 and noted that this influenced the decision making: "His son his son about to get touched real ugly right now, real ugly and that's his blood son and I know I know I know [UI] that's [Victim 25's] son and [Victim 25] got a good resume out here." NIEVES then stated, "But yo enough is enough bro enough is enough we bout to light light this little nigga up like bout to take him out." CW-9 pleaded with NIEVES to let CW-9 reach out to Victim 25 first and address the issue. NIEVES then stated, "Imma send you the screenshot first to go read it so you know what I'm talking about bro we're about to light him up real bad right now it's broad daylight we're ready."

181. CW-9 immediately informed investigators that NIEVES was planning on having Victim 13 killed. As a result, investigators reached out to contacts in the Lowell Police Department Gang Unit in order to saturate the area and attempt to locate Victim 13. CW-9 was

able to contact Victim 25 who contacted his son to leave the Lowell area.

182. A 6/4/19 recording captured a meeting of the Massachusetts State Team and CECCHETELLI, at the Mount Carmel Club, located at 13 Winthrop Street, Springfield, MA. Present for this meeting were LIBERATO, F. LOPEZ, NUNEZ, CECCHETELLI, PEGUERO-COLON, and MARRERO. During the meeting, CECCHETELLI discusses an issue involving Victim 13 and discuss the fact that NIEVES the Inca of the Lowell Chapter wanted to issue a green light to kill Victim 13, the son of Victim 25.

183. CECCHETELLI ruled on this matter stating, “we are not going to go looking for him,” because they cannot condone the killing of a son of a LATIN KINGS member. However, CECCHETELLI then stated, “if a brother bumps into him on the street, we can’t tell that brother to stand down,” in essence affirming that the murder of Victim 13 has been approved.

IV. Distribution of Controlled Substances, Cocaine, Cocaine base, and Heroin

184. In addition to his leadership role, Jorge RODRIGUEZ runs multiple crack houses in the city of New Bedford, for which he cooks and supplies the cocaine base that is sold by the LATIN KINGS. Jorge RODRIGUEZ was captured in video recordings on 5/30/19, 7/10/19, 7/31/19, 8/2/19, 8/7/19 cooking over 250 grams of cocaine base on each occasion. In the videos Jorge RODRIGUEZ can be seen standing at a stove, with a scale and cocaine visible, stirring, measuring, and actually cooking the cocaine into crack. These videos of actual manufacture highlight numerous other recordings, where Jorge RODRIGUEZ and other members discuss distribution of crack cocaine, means and methods. In the 8/7/19 video, two firearms can be observed.

185. Numerous other recordings exist where Jorge RODRIGUEZ discusses drug prices, distribution of bulk amount of crack cocaine to other LATIN KINGS members.

Additionally, there are recordings of Jorge RODRIGUEZ's stash locations, and of Jorge RODRIGUEZ delivering crack cocaine to other members, and instructing members of the LATIN KINGS to sell drugs in certain locations and only use certain doorways to insulate the operation, i.e., prevent law enforcement from acquiring specific knowledge of the apartment units where the drug operation was centered.

186. Recordings from 8/6/19 and 8/7/19, captured the sequence of MARRERO purchasing crack cocaine from Jorge RODRIGUEZ and bagging up approximately 62 grams of crack cocaine in the basement of 358 North Front Street, New Bedford, MA. The 8/7/19 recording captures MARRERO bagging up 62 grams and breaking the 62 grams into 0.2 gram quantities, which are \$20 bags. A still image from the recording follow:



187. On 6/8/18, CW-3 purchased 50 grams of heroin from ROLDAN.

188. On 7/3/18, CW-3 purchased 50 grams of heroin from ROLDAN.

189. On 7/26/18, CW-3 recorded the purchase of a Hi-Point, .45 cal. Handgun, magazine, and 30 rounds of .45 caliber ammunition from ROLDAN. The recording stopped

during the transaction, but recorded calls discussing and arranging the purchase were captured.

190. CW-1 has made numerous recorded purchases of cocaine base from F. LOPEZ.

Those recorded purchases are summarized as follows :

- 2/19/15, purchase of approximately 14 grams of crack cocaine for \$800;
- 3/8/15, purchase of approximately 14 grams of crack cocaine for \$800;
- 3/19/15, purchase of approximately 14 grams of crack cocaine for \$800;
- 4/2/15, purchase of approximately 14 grams of crack cocaine for \$800;
- 12/22/17, purchase of approximately 28 grams of crack cocaine for \$1,400;
- 1/2/18, purchase of approximately 1 oz. of crack cocaine for \$1,400;
- 1/3/18, purchase of approximately 1 oz. of crack cocaine for \$1,400;
- 1/18/18, purchase of approximately 1 oz. of crack cocaine;
- 2/6/18, purchase of approximately 2 oz. of crack cocaine for \$2,600; and
- 2/21/18, purchase of approximately 2 oz. crack cocaine for \$2,600.

191. A 9/29/19 recording captures NUNEZ in the basement of 358 North Front Street, New Bedford, MA, bagging cocaine base with Jorge RODRIGUEZ present.

MASSACHUSETTS DOC SELECTED RACKETEERING ACTIVITY

192. The Massachusetts Department of Corrections (“DOC”) oversees the state prison system housing all individuals sentenced to terms of imprisonment. The DOC is made up of 16 institutions organized by security level: Maximum, Medium, and Minimum. The LATIN KINGS are the largest documented gang within the DOC with over 380 members. LATIN KINGS housed at each Maximum and Medium security prison report to a leadership structure similar to that on the street. As with the street, the various DOC Chapters are responsible for reporting to the Supreme Regional Officer (“SRO”) who maintains communication with LATIN KINGS State Leadership. The Secretary to the SRO is responsible for facilitating communication between the various DOC prisons and the SRO. Often relaying orders to terminate or violate LATIN KINGS members in bad standing or who are suspected of cooperating with law enforcement, or rival gang members. The SRO maintains control over the incarcerated LATIN KINGS through coordinated violence.

193. Security camera footage, recorded jail calls, the seizure of gang materials and letters (“kites”), emails, and coded messages were collected during the course of the investigation. This evidence demonstrates that Latin Kings violence continues post-conviction.

I. Conspiracy to Murder, Intimidate Cooperating Witnesses (“Snitches”) Victim 5

194. On 12/15/18, a consensual recording captured PALACIOS calling CW-3. During the call PALACIOS stated, “Yo bro, make sure they get that nigga, ‘cause that nigga’s a rat.” PALACIOS explained to CW-3, “The nigga got Blessed in Walpole”; “The nigga ratted on Boylston”; “The nigga’s getting a T”; “When that whole raid happened on Boylston the nigga’s the one that ratted”; “Imma bout to shank this nigga on Crowns.” PALACIOS states that he was getting the “paperwork” and that Victim 5 would be “food” (slang for assaulted) and get a “T” (slang for terminated). Later in the call, PALACIOS states, “Imma bout to shank that nigga,” which means stab. Based upon information developed over the course of the investigation, the person being discussed is Victim 5.

195. On 12/18/18, a consensual recording captured CW-3 calling W. PEGUERO inquiring about Victim 5 who was identified by a nickname. W. PEGUERO stated, “Yea he’s from around the way and he’s a rat.” CW-3 stated “yea he’s rattin and shit. This nigga told me to send Cisco a picture and all that info and shit.” CW-3 said ROLDAN called and said, “I dunno why niggas going through the State on something like this. That that that Dubb knows that Fruity and Ace are running the jails right now and they shoulda just spoken to Ace. I shoulda never went through Cisco and shit ‘cause Fruity and Ace run the DOC.”

196. On 12/18/18, BARROS called CORREA. During the call, CORREA told BARROS that she is waiting for “Ace to call because I haven’t even told you about Little E.” BARROS replies, “How’d you find out about Little E?” CORREA replies that “Nelty,” referring

to ROLDAN, “told me. He sent me a picture of [Victim 5] and asked if I knew him. And I was like Yea! And then he sent me the picture of a paper thing...you know to read it...and I was like holy shit! And then he called me.” BARROS interrupts and says, “Make sure you get in contact with Ace’s sister and make sure Ace gets on that ASAP.” CORREA replies, “I already did.” BARROS continues, “that was probably the one that was working with them boys when I was down there and I was wondering where it was coming from...it was probably his faggot ass.” CORREA commented that she had told A. RODRIGUEZ’s sister and wife to have Ace call her. BARROS replies, “MAKE SURE THAT GETS DONE...SETTLED...I WANT THAT SETTLED! I WANT THAT OVER WITH!” BARROS sighs saying that he “hates all Erics because they are either bitches, fags or rats.” CORREA corrects her stating, “his name is [Victim 5], babe.”

197. During the conversation with BARROS, CORREA received an incoming call on another telephone from A. RODRIGUEZ and they attempt to identify Victim 5, by name and description. CORREA put BARROS on mute and says “you know what I have to do.” CORREA turns to her conversation with A. RODRIGUEZ and says, “[Victim 5] is a chota (rat).” A. RODRIGUEZ replies, “no.” CORREA confirms, “yes, Nelty¹⁰ got paperwork.” A. RODRIGUEZ asks, “what kinda paperwork? Are you sure it’s the same [nickname of Victim 5] were talkin about?” CORREA affirms and says, “he sent me a picture.” A. RODRIGUEZ asks, “what’s the last name?” CORREA replies, “Gonzalez.” A. RODRIGUEZ asks, “the last name starts with a C?” CORREA says, “G...he’s a probie.” A. RODRIGUEZ says, “that’s the wrong person.” CORREA says that she’s got a picture and “he’s got a red rose on his left arm.” A.

¹⁰ ROLDAN’s middle name is Nelty.

RODRIGUEZ asks, "what he telling on?" CORREA replies, "everybody... his own people. He's got a lady, like a Jesus lady, ummm what's her name Mary, with a flower on top of it on the arm." A. RODRIGUEZ replies, "ohhhh I know him.... What did A (ROLDAN) say?" CORREA replies, "he said he had the paperwork.... He says call Dubb...He said, man listen he a rat." A. RODRIGUEZ replies, "text Dubb and tell him this nigga Ace about to call you." Later in the call A. RODRIGUEZ says that the person he is thinking of has a different last name. CORREA replies, "you know who he is. He came from the Pole (Walpole) with you guys. He looks like he's Guatemalan. He's like white."

198. Shortly thereafter, W. PEGUERO, CORREA and A. RODRIGUEZ then engage in a conference call. During the call A. RODRIGUEZ asks W. PEGUERO, "what's up with this nigga...this nigga that Nelty's talking about?" W. PEGUERO says, "remember [Victim 5]?" A. RODRIGUEZ says, "yeah." W. PEGUERO replies, "he's no good bro." A. RODRIGUEZ says, "for sure? For sure?" W. PEGUERO replies, "for sure for sure. Do you remember that whole raid over there on Boylston? It was Nene tellin me that shit." A. RODRIGUEZ says that he wants D5K members to come see him so they are not talking "all crazy on the phone and shit." A. RODRIGUEZ asks W. PEGUERO if he saw the "work because I don't like to step unless it's confirmed. Is that word golden?" W. PEGUERO affirms that it is. A. RODRIGUEZ then says, "say no more then." W. PEGUERO confirms that "Nene," referring to PALACIOS, is getting the paperwork. They agree to speak the following day to confirm everything.

199. On 12/19/2018, CW-3 speaks to W. PEGUERO and says, "This nigga was never blessed...umm [Victim 5]." W. PEGUERO replied, "Big A spoke to Ace yesterday and Ace called me and talked to confirm it and Ace wants to make sure niggas seen paperwork first before he makes something happen up there."

200. On 12/19/18, PALACIOS sent court paperwork to CW-3 who was directed to forward it to F. LOPEZ. CW-3 did as he was directed, but also notified his FBI handler who immediately had Victim 5 located and moved to a protected unit within the DOC.

201. On 12/20/18, A. RODRIGUEZ called W. PEGUERO. During the call W. PEGUERO tells A. RODRIGUEZ “Yeah bro, niggas seen that, I seen it.” A. RODRIGUEZ replies, “Yeah I hear you, I just don’t want to say nothing crazy.” During this exchange, A. RODRIGUEZ is telling W. PEGUERO that he does not want to discuss this on a recorded telephone. W. PEGUERO replies to A. RODRIGUEZ, stating “Yeah, nah, nah, I’m hip, but Lexi said he gonna see you Sunday, I just spoke to him this morning.” During this exchange, W. PEGUERO tells A. RODRIGUEZ that A. PEGUERO is going to come visit A. RODRIGUEZ on Sunday so they can discuss Victim 5 being a law enforcement informant.¹¹

202. Later, A. RODRIGUEZ places another recorded call to W. PEGUERO. During the call, A. RODRIGUEZ asks “Hey yo bro, you said that you seen that yourself right?” I believe A. RODRIGUEZ is speaking about the paperwork naming Victim 5 as an informant. W. PEGUERO says “Yeah.” A. RODRIGUEZ states, “Hey yo, now this is my question, is it a police report or is it minutes?” W. PEGUERO says “I got the, I got the whole, I got the whole page, it’s like from, it’s like a court document.” A. RODRIGUEZ reply’s “So it’s Grand Jury minutes, does it have q’s and a’s? W. PEGUERO states “It’s a incident report.” A. RODRIGUEZ asks, “An incident report?” W. PEGUERO replies, “Yeah it says his name and everything he said, he got robbed.” W. PEGUERO tells A. RODRIGUEZ that this is one

¹¹ It should be noted that DOC records noted A. PEGUERO visiting A. RODRIGUEZ on Sunday 12/23/18. A. PEGUERO was captured on video surveillance entering the institution where A. RODRIGUEZ was housed.

incident and there is more paperwork that they are waiting on.

II. Conspiracy to Murder Lucerne Street Gang Members

203. On 7/8/15, Boston Police responded to a female shot to death inside of Puddingstone Garden. The victim was later identified as GS, a/k/a “Chi Chi.” As of November 2019, no arrests have been made in this homicide investigation.

204. In 2018, LV became a probationary member of the D5K Chapter of the LATIN KINGS. LV is the son of RV, a/k/a “King Tiger” – one of the original D5K members, and GS, a/k/a “Chi Chi.”

205. On 10/4/18, BARROS placed a recorded telephone call to CORREA. During the call BARROS asks CORREA, “Babe ask um, ask A, so you could talk to me tomorrow, ask A” (identified as ROLDAN) “what’s good with Lucerne?” CORREA responds, “Lucerne?” and BARROS affirms. BARROS says “Yeah that’s important” and CORREA responds “Hold on, let me text him right now.” CORREA can be heard reading a text message out loud that she is sending to ROLDAN.

206. On 10/8/18, BARROS is recorded discussing the murder of Grisel Sanchez, a/k/a “Chi Chi” with CORREA. During the call CORREA states, “Chi Chi and J-Rock. J-Rock says he loves you and so does Chi Chi.” BARROS replies, “who?” CORREA then states, “Chi Chi and J-Rock they both love you.” BARROS says, “alright alright I got you.” CORREA states, “oh and ummm Chi Chi says Little Ryder¹² and Big Ryder¹³ they say hi.” BARROS asked for CORREA to confirm what she said, “Big Ryder and Little Ryder?” CORREA replied, “yep,

¹² Identified to be Victim 14, a Lucerne Street Dawgs member.

¹³ Identified to be Victim 15, a Lucerne Street Dawgs member.

they says hi.” BARROS states, “alright I love you.”

207. Later that evening, BARROS and CORREA are recorded speaking about Chi Chi again. During the call BARROS asked if “Ace called.” CORREA replied, “not yet. Concord’s gonna call on Thursday.” BARROS asked, “how did you find out about Chi Chi?” CORREA replies, “Nelty,” referring to ROLDAN. BARROS then states, “he shoulda known that when I asked him what I asked him.” CORREA replied, “yea well he’s lost in his own world.”

208. In another call later that evening, A. RODRIGUEZ is recorded talking to CORREA about BARROS. During the call CORREA states that BARROS was asking about “Chi Chi.” A. RODRIGUEZ asks, “Chi Chi, Tiger’s BM?” CORREA replied that BARROS is “asking about Lucerne.” A. RODRIGUEZ stated, “Lucerne oh yea yea yea...ask him what’s up wit it. What’s he need to know? I can tell him.” CORREA then inquired, “Who was it. That’s what he wants to know.” A. RODRIGUEZ replied, “That’s not a person that’s fucking ummmm...” CORREA interrupts and stated, “He wants to know who did it.” A. RODRIGUEZ stated, “Ummm Ummm I don’t wanna say too much on the phone.” In response, CORREA asked, “It was little and big right? Little and Big.” A. RODRIGUEZ confirmed that it was stating, “yea yup yup yup, one of them one of them.” CORREA stated, “that’s ok they’re there.” A. RODRIGUEZ then asked, “Both of them?” CORREA indicated that she is not sure and A. RODRIGUEZ replied, “tell him it was one of them, but I think it was the older one.”

209. On 10/11/18, at the Souza Baranowski Correctional Center, Lucerne Street Dawgs member who I will refer to as Victim 16 was assaulted by LATIN KINGS member AS.

210. On 10/11/18, BARROS placed a recorded telephone call to CORREA. During

the call BARROS told CORREA, “Your son fucking Stacks¹⁴ and [BC] is in the box.” The box is slang for the segregation unit within a prison, where inmates are sent to segregation when they violate major institutional rules such as engaging in physical altercations. CORREA replied, “What the, oh beautiful.” BARROS then informs CORREA that this occurred in response to the “Chi Chi” issue that they had already discussed: “You know I already told you about that Chi Chi.”

211. On 10/14/18, Victim 16 is recorded placing a call to an unidentified individual. During the call Victim 16 stated, “I got moved on nigga. I didn’t do nothing!” Victim 16 indicated that he did not know the assailant, “I dunno an OT cat. I got jumped basically.... Some Spanish cat from Lawrence.”

212. A 10/14/18, recording captured a D5K cypher meeting at Hyatt Place in Braintree, MA. GUERRERO, Adam PEGUERO, PALACIOS, MATOS, Oscar PENA, Angel ORTIZ, Gismael ORTIZ, Lisandro Vasquez, and FAMILIA-VALDEZ were present. The meeting was held so that D5K members could discuss the murder of GS, a/k/a “Chi Chi”, by a Lucerne Street gang member. During the meeting GUERRERO stated, “I’m with it, fuck, those niggas, they dipped my niggas mom!” ROLDAN called in and proclaimed that D5K are now at “war” with Lucerne. ROLDAN reported that BARROS ordered that two Lucerne Street gang members in the DOC were to be “hit” and that A. RODRIGUEZ was plotting to take out Lucerne Street gang leader Victim 15 who was in DOC custody. ROLDAN stated that he “has two hitters on deck who can move for D5K” (shoot without bringing suspicion back on the LATIN KINGS). During the meeting they discussed the identities of several Lucerne Street gang members and where they

¹⁴ Identified as AS, who is not CORREA’s son.

lived.

213. On 10/14/18, BARROS placed a recorded telephone call to Juan FIGUEROA. During the call, BARROS indicates to FIGUEROA that he has one or two dogs that he put down as D5K. FIGUEROA tells BARROS that he has to stop putting LATIN KINGS members down under D5K that are not from there. BARROS indicates that he has been around this a long time and needs to have two or three of them around. FIGUEROA indicates that when they come home they look like bozos. BARROS speaks about training them and having them follow him. FIGUEROA states “Gramz” (identified as CL) “is going against his own niggas for you.” BARROS replies, “Yeah facts nigga and he crushed two or three niggas up here, I’m talking about crushed nigga. Matter of fact he was the one that took out the blow when I got at it with them kids and he got at for Chi Chi.” I believe BARROS is indicating that CL assisted with assaulting Lucerne members for the murder of GS.

214. On 2/08/19, BARROS placed a recorded telephone call to FIGUEROA. The following LATIN KINGS inmates CL and LM, a/k/a King Flow also participated. COTTO is also present with FIGUEROA and speaks with CL and LM at times throughout the call. During a portion of the call, CL indicates that he is now part of D5K under BARROS. COTTO and FIGUEROA give CL a hard time about being part of D5K because he is not from Boston. CL becomes angry and states to COTTO that “Word to mother I want a pistol as soon as I get out, I don’t give a fuck.” Later in the call CL states to FIGUEROA, “Hey yo don’t let that nigga fool you, that fat ass nigga went out there word nigga, me and this nigga here are the ones that put in work that’s how I got down with the D nigga for being a savage...” I know that D is a term used to refer to D5K.

III. Attempted Murder of Victim 17

215. On 2/28/19, at Souza Baranowski Correctional Center (“SBCC”), Maximum Security State Prison, security footage shows a person who I will refer to as Victim 17, enter the P1 Housing Unit and walks down the right side of the unit towards the stairwell. As Victim 17 passes in the vicinity of cell three he is set upon by LATIN KINGS members DZIERWINSKI, JJR, ARS, and JR as well as three other inmates. A multiple inmate fight was then reported by the Unit Officer and security cameras repositioned to capture the altercation. The video footage captures inmate JJR stabbing Victim 17 multiple times while the other inmates punch and kick him. Victim 17 is observed to have a weapon in his hand. Victim 17 sustained three puncture wounds to the upper left arm area and ten puncture wounds to his back.

216. Still images of the surveillance footage, and the victim’s clothing follow:



(left) Still image of attack – (right) bloody clothes cut off Victim 17

217. On 3/6/19, ARS placed a recorded phone call to an unknown female (UF) he refers to as Courtney. During the call ARS describes being in a huge fight that is going to be in the segregation unit for like five or six months. The UF asks ARS, “what the fuck did you do?” ARS indicates that he sent her a letter explaining it. ARS indicates the incident getting referred to the District Attorney’s Office and indicates he may be picking up new charges. The UF asks ARS if it was “gang related.” ARS indicates that it was but he can’t really talk about it over the

phone because it is still being investigated.

218. On 3/6/19, LATIN KINGS member JR placed a recorded telephone to LATIN KINGS member and former inmate EKC. During the call JR indicated that he was placed in segregation on pending investigation status. JR indicates that an inmate came into the unit and JR indicates that he saluted this individual and began talking to him. JR is referring to Victim 17. JR indicates that the “bros,” meaning LATIN KINGS members started moving close and then moved on the dude. JR indicates that it was Victim 17, who is identified by nickname. EKC reacts in a shocked manner that Victim 17 was moved into the P-1 Housing Unit. JR goes on to indicate that he was speaking with Victim 17 then Victim 17 went to clean out his cell and then when he came out they started moving on him. JR indicated it was a six on one altercation and there was blood everywhere. JR indicates that people were mad. EKC indicated that two people could have scraped Victim 17 up but EKC indicated if people wanted to make an example then fuck it.

IV. Conspiracy to Assault with Attempt to Murder (Victim 35)

219. A 4/12/17, encrypted letter from NIEVES to inmate IC includes a cryptogram saying CECCHETELLI ordered NIEVES, to terminate on sight, i.e., assault, fellow inmate Victim 35 for stealing money from the LATIN KINGS Lowell Chapter “fundo” or treasury. Mass. DOC was able to obtain the cypher key allowing them to intercept the messages. Mass. DOC took action to prevent any violence. The letter and cryptogram are show below:

ADY

I DON'T HAVE THE LETTER WITH A STRONG
RIGHT FOR ME MY JEST WITH NOTHING BUT
Respect for you and the nation.

CO WHAT'S GOOD BRO? Sorry I HAVEN'T
got back at you but I've BEEN CRAZY ON MY
SIDE BRO'S FROM HOLY BAK SPRING TOWN. I
HAVE BEEN COMING DOWN MY TO TELL US
HOW TO RUN SHIT IN THE MILL & THE WIZARD
HAS BEEN SENDING THEM TO RECUITE. BRO SINCE
YOU GOT LOCKED UP SHIT'S BEEN CRAZY. I'VE
LEFT UP THE MAX FOR BRO'S, PRAISE ALL IN THIS
SIDE. BROTHER WHAT I UNDERSTAND SOME BRO'S
FROM THE MILL WAS INVOLVED IN THAT SHIT SO THEY
THINK THEY CAN SEND SOME HOLY BAK NIGER TO THE MILL
TO RUN SHIT. NEXT TIME WE GOING TO COME
BACK AND NOICE IF THEY COME BACK ON SOME
BULL SHIT. IN GODS WORD TO YOU IS SHIT AS
DOWN FOR ONE BRO. BROTHER (BRO'S) WIZARD
AND INTERVIEW WITH A FEW OTHER SMALL CHAPS
READY TO PUT IT DOWN ON YOUR CHINA AND
BRO'S JUST COPE SOME NEW WHIPS FOR
US TO USE. WE'VE 60 MILES TO THE
GALLER. FED ME? BIG BRO SHIT lol.

Well I'll gonna out this letter out. DON'T
SLACK ON WRITING ME BACK. AD IF YOU UP
WITH DM NIGER, I'VE TELLING TO SEND
MILITARY NIGER TO TAKE MY MILITARY CITY & KILL
THE NIGER. HOP STICKY FINGERS WITH THE FINGER
SHIT. TOWN OUT WHEN I WENT UP. HE WAS #4
I leave you to go. Another Day Sorry

Love & Respect

ADY

7

NUMBER LAMA

0189536251355	60422
5166925544344	51669
33602988651555	42153
(32344215)360198	32044
8122365582144	43338
231333336092811	13123
16439277423338	51555
	25135

15 = K 13 = D | DANKY
KONG

44 = T 34 = O 43 = S
Furniture on site

32 = M 34 = O 42 = R 15 = F
(From)

32 = M 14 = E 42 = R 31 = L

23 = I 33 = N (marlin)

NUMBER LAMA

0189536251355	60422
5166925544344	51669
33602988651555	42153
(32344215)360198	32044
8122365582144	43338
231333336092811	13123
16439277423338	51555
	25135

The code key translates to

1	2	3	4	5
1 A	B	D	E	F
2 G	H	I	J	K
3 L	M	N	O	P
4 Q	R	S	T	U
5 V	W	X	Y	Z

The code key can be read from up down and the left to right and in the number game everything either starts or ends with 360 or 555 so for example if the number say 3601325555 the numbers between 360 and 555 would translate to (13=D) (25=K) In this case DK would translate to Donkey Kong.

V. Witness Retaliation in Relation to HARRISON Armed Assault with Intent to Murder Conviction (HARRISON, CORREA, D. LARA)

220. On 8/6/18, BARROS calls CORREA. During the conversation BARROS is captured saying, “Tell Rev when he calls, I forgot to tell him this – this is important – listen to me because he is who he is to me he can’t say he’s on P (probation with the LATIN KINGS) – he’s down, he’s got MY blessing, you heard? If they ask who gave his Blessing, who his GF (godfather) is, it’s ME. You heard?”

221. On 7/25/19, HARRISON places a recorded call to D. LARA telling him that a confidential informant, or “CI” was used in his case, which is discussed in detail below. The following is a draft transcript of a portion of the conversation:

HARRISON:	I was going through my shit...there...there...there was a CI on my case.
D. LARA:	Oh yea?
HARRISON:	Yep and I found my paperwork.
D. LARA:	Who is it?

HARRISON: It doesn't say who it is, but was going to record on something else and two officers was preparing him I guess and then they realized he was a CI for another officer they knew and they didn't know that and he said he had information about me that led to my investigation and my arrest...and the judge granted the DA to suppress him from coming into my trial because...

D. LARA: Oh yea! I need that! I need that!

HARRISON: I wrote my appeals attorney and requested the affidavit of what the CI said that led to my investigation and arrest in this alleged crime.

222. HARRISON agrees to write to D. LARA and include the identity of the confidential informant. Later in the conversation the two discuss HARRISON's case. The following is a draft transcript of a portion of the conversation:

HARRISON: I was there for them.

D. LARA: I'm gonna stop you right there....what you talkin about church?

HARRISON: No! Not church! Forget about church...I mean I left those folks man! I'm talkin' about my niggas...my boys...you know I'm talkin about the BROTHERS.

D. LARA: No bullshit everything's divided right now... we all got our own families... we all old.

HARRISON: Even that should not be an excuse.

D. LARA: Of course not. I still reach out.

HARRISON: I ain't talking about you.

D. LARA: You never talk about me why?

HARRISON: Why I don't worry about you. Because you always there. I remember you saving my life nigga. I won't forget about that! ... When I let the damn gang go into the house.

223. On 7/27/19, HARRISON calls D. LARA and tells him, "you should get my letter soon." D. LARA says, "I already got it." HARRISON asks, "oh you got the first one? Ok." D. LARA asks, "you sent another one?" HARRISON states, "I gotta sit down and write that one

and I gotta write you whats in it on the ahhh discovery so you can better understand. I got another court transcript yesterday. Of the victim testifying. It is so crazy bro. It was a kangaroo court bro.”

224. Later that night HARRISON speaks with D. LARA again and the two continue the conversation about identifying the confidential informant. The following is a draft transcript of a portion of the conversation:

HARRISON: All I know on the paper is the two officers was interviewing a CI for a case in 2010 it was preparing him for a trial that was coming up...for whatever happened in 2010 and then whoever it was had a case in 2010. The two officers didn't know he was a CI for another officer.

D. LARA: We need to know because it had to be somebody around us at the time and we really didn't have much people around us. You can give me an idea then I can have an idea, you feel me?

HARRISON: I'm gonna write. I'm not gonna on the phone, but I'm gonna write. I'll let you know his name but I don't want to say anything on the phone.

HARRISON: What's up with Oscar, Double O?

D. LARA: Double O? Ahh I dunno he's around. Being a follower.

HARRISON: Of course of course that's why I threw it out there! It's funny cause I know in Nash he had an open case cause the detectives came up and talked to him.

D. LARA: Ah ha.

HARRISON: ...and they did ask him about me. But he said that he wouldn't say anything about me he wouldn't say anything he knew nothing. Which was the cuckoo thing, which I thought was kinda weird.

D. LARA: That's why I'm trying to ask if you have an idea.

HARRISON: That's why I'm gonna write you cause I have an idea.

D. LARA: A couple niggers got questioned on your shit that's why I asked to see if you had an idea.

HARRISON: Imma write you cause I do have an idea.

D. LARA: I have an idea too, but I wanna see...that's what threw me off ya feel me...cause when you said that.

HARRISON: They were prepping this guy for a 2010 case but he was definitely was a CI for this officer and they didn't know he was because he was supposedly one of mine. The paper says it led to the investigation and my arrest. So I want him to get the affidavit on what the CI said. And the judge suppressed the CI in my case because it would blow his whole cover.

225. On 7/31/19, HARRISON placed a recorded call to D. LARA. During the call HARRISON asks D. LARA if he got the letter and D. LARA replies that he did, that HARRISON still hasn't told him who HARRISON thinks was the CI. HARRISON tells him that he did and he mentioned to him that did he thinks it's the one that the detectives came to see when they were at "Nash" (Nashua Street Jail, Suffolk County). HARRISON asks D. LARA who was at Nash with them and mentions the three persons that were on Mass. Ave. when they were stopped. HARRISON tells D. LARA that two detectives came up to talk to the suspected informant. D. LARA asks if HARRISON has any other suggestions and HARRISON indicates that is the only one he has. Investigators believe that HARRISON suspects Oscar PENA because Oscar PENA was visited by Detectives at Nashua Street Jail following his arrest with D. LARA and W. PEGUERO on the night they cleaned guns and drugs out of 18 Pompeii Street for HARRISON.

226. On 8/7/19, HARRISON placed a recorded call to D. LARA to discuss their suspicion of whom they perceive to be the confidential informant in HARRISON's case. They discuss a "bald-headed" person they believe may be the confidential informant and rule out PENA due to his age at the time of 2010. D. LARA discusses paperwork coming out on the bald-headed individual so they believe he was the one that was the confidential informant.

VI. Witness Retaliation; Attempted Murder (DZIERWINSKI)

227. On Tuesday, March 6, 2018, DZIERWINSKI was involved in a LATIN KING attempted murder of Victim 39, an inmate who had been labeled a “snitch” for cooperating with law enforcement. During the attack, Victim 39 was stabbed 12 times before DOC personnel were able to intervene.

228. The following day DZIERWINSKI’s cell was searched and officers recovered a six and a half inch long by two and one-half inch wide sharpened piece of metal in his cell (“shank”). The shank had been made from a piece of shelving.

D5K CHAPTER SELECTED RACKETEERING ACTIVITY

I. Attempted Murder of Victim 18

229. On 3/3/15, Victim 18, a student at English High School in Boston, was found on Magazine Street in Boston suffering from a gunshot wound to the back of the head. Victim 18 was transported to the Boston Medical Center and found to have for a gunshot wound behind the right ear and a bullet lodged in his cheek. Victim 18 denied knowing who shot him, only that he heard a loud bang. A canvass of the area resulted in the discovery of blood splatter, a black hooded jacket and a folding knife.

230. On 3/4/15, Victim 18, who was out of surgery and stable, told detectives that prior to the shooting he was working as a drug dealer for “Rev,” the Dean of the Academy at Boston English High School. Victim 18 stated he had been working “Rev” for a month and owed him a \$10 drug debt. “Rev” was later identified to be Shaun HARRISON. Victim 18 stated that HARRISON recruited Victim 18 to deal drugs for him after Rodriguez got into an altercation with another student. Victim 18 stated that HARRISON was a member of the LATIN KINGS who was responsible for recruiting new drug dealers in the school to sell on behalf of the D5K

Chapter of the LATIN KINGS. Victim 18 identified “Rev” as HARRISON, and stated that HARRISON had the word “Rev” posted on his office door at the school. According to Victim 18, he met with HARRISON on 3/3/15 and they walked around looking to “smoke weed and fuck girls.” When they reached Magazine Street, HARRISON shot Victim 18 in the back of the head. School police confirmed that HARRISON was also referred to as “Rev” and had the name posted on his office door.

231. Detectives located video footage of the shooting. According to reports, the video shows two individuals walking single file down the sidewalk on Magazine Street due to the narrow sidewalks as a result of excessive snowfall. The individual in the rear is dressed in a black hooded jacket and pulled out a firearm and shot the person in front of him. The shooter then ran back to 18 Pompeii Street.





Still Images of March 3, 2015 Shooting

232. After viewing the video, detectives went to 18 Pompeii Street, Apartment 2 and asked HARRISON if he would come to the station to answer questions about the shooting. HARRISON agreed and gave a post-Miranda interview on tape denying any knowledge about the shooting. When detectives asked HARRISON what he would say if he knew the shooting was caught on video, HARRISON replied, “I respectfully request an attorney.”

233. While HARRISON was being interviewed, a detective conducted surveillance of 18 Pompeii Street and observed D. LARA, W. PEGUERO, and Oscar PENA exit. The detective approached them while they waited at a bus stop on Massachusetts Avenue. The detective told D. LARA, W. PEGUERO, and Oscar PENA that he was investigating the shooting and wanted to speak with them. They agreed. The detective then stated that he was going to conduct a pat frisk prior to their conversation. The detective asked D. LARA if he had anything he shouldn't have and D. LARA replied that he had a firearm. The detective lifted the front of D. LARA's shirt, observed the handle of a firearm protruding, and recovered a silver Bryco Arms 9mm semi-automatic firearm from his waistband. D. LARA, Oscar PENA, and W. PEGUERO were placed under arrest. A black backpack was removed from Oscar PENA and contained a Smith and Wesson .45 caliber semi-automatic firearm and a large amount of marijuana. During booking it

was noted that HARRISON, D. LARA and W. PEGUERO all have the same “100” gang tattoo.



*March 4, 2015 Firearms and Marijuana seizure from D. LARA and O. PENA
Image of HARRISON's LATIN KINGS tattoos*

234. A search warrant was executed at HARRISON's apartment and a large LATIN KINGS mural was observed on his wall.



LATIN KING mural from 18 Pompeii Street

235. In June 2018, HARRISON was convicted by a jury in Suffolk County Superior of the attempted murder of Victim 18, and sentenced to eighteen to twenty years in state prison. His case is currently on appeal. The seizure of the firearms and ammunition against D. LARA, Oscar PENA, and W. PEGUERO was suppressed.

236. On 10/14/18, CW-3 recorded a D5K meeting attended by RG, A. PEGUERO, PALACIOS, UM, PENA, Angel ORTIZ, GO, and FAMILIA-VALDEZ. During the meeting, ROLDAN is overheard calling in to the meeting. When he does call in, ROLDAN expresses his displeasure that the D5K members are not sending money to members in the DOC. ROLDAN states, “Oh yeah that’s another thing. I don’t care what ya’ll be doing with the fundo, but you guys need to like Rev, Rev. I ain’t even mentioning Fruity, I ain’t even mentioning Fruity. I’m mentioning Rev first. Because if it wasn’t for Rev being locked up doing whatever time he is doing, he could’ve been had the twins¹⁵ locked up, he could’ve had Nasty¹⁶ locked up, he could’ve had Nene¹⁷ locked up, he could’ve had Stevie¹⁸ locked up, he could’ve had me, [CW-3], he could’ve had the whole hood locked up for like twenty plus years. Niggas don’t even send that nigga one fifty (\$150). You know what I’m saying my nigga?”

II. Murder of Victim 41 - Conspiracy to Murder, and Accessory after the Fact to Murder

237. The LATIN KINGS and the D5K Chapter in particular have had a longstanding rivalry with the Dominican Don’t Play (DDP) gang. According to CW-3, the origin of the rivalry began several years ago when D. LARA was stabbed by DDP members. A “greenlight,” or order to kill, was issued against any member of DDP. This rivalry remains to this day, and is reflected in numerous music videos posted by Massachusetts LATIN KINGS members.

238. On 4/12/09, Easter Sunday, Boston Police homicide responded to a house party

¹⁵ Referring to W. PEGUERO and A. PEGUERO.

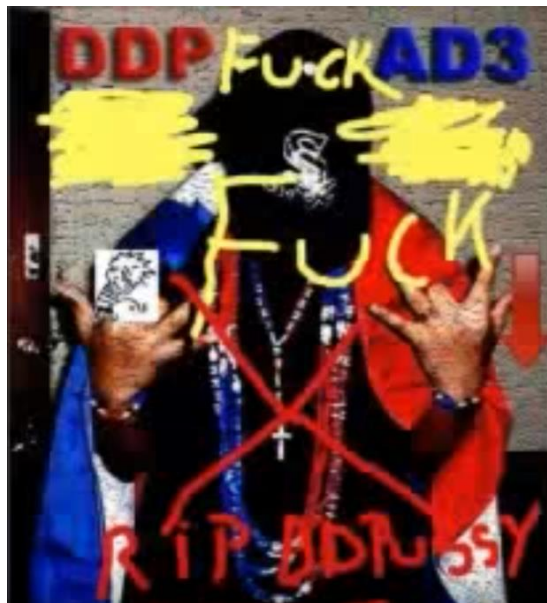
¹⁶ Referring to D. LARA.

¹⁷ Referring to PALACIOS.

¹⁸ Referring to FAMILIA-VALDEZ.

during which Victim 41 was shot and killed. The murder has yet to be solved. CW-3, reported being present at the party and stated that W. PEGUERO shot and killed Victim 41.

239. In March 2010, D'Generalz, a D5K rap group, uploaded a video on YouTube titled "Putt'en In Dha Dirt," which can be viewed at <https://www.youtube.com/watch?v=ZGIIZGiPTqQ>. During the video, W. PEGUERO and A. RODRIGUEZ are featured. During the video W. PEGUERO raps, "Dropped a couple niggas because I started shooting first," while images depicting DDP logos covered in graffiti that reads, "RIP DDPussy" written across it. Additionally, the Calvin cartoon character is depicted urinating on an image of a DDP member. One of the images follows:



240. In April 2019, investigators initiated a court-authorized interception of W. PEGUERO's telephone. During the interception period, BPD detectives dropped business cards at the residence of various individuals believed to be witnesses to Victim 41's murder.

241. On 4/10/19, at approximately 5:24 pm, W. PEGUERO called A. PEGUERO. During the conversation, W. PEGUERO states he was nervous because he found the business card of a Homicide Detective in the door to his home. W. PEGUERO speculates this has

something to do with a recent homicide involving other LATIN KINGS members.

242. On 4/10/19, at approximately 7:05 pm, W. PEGUERO received a call from his mother. The mother tells W. PEGUERO that the detectives wanted to speak with him “about Victim 41.” W. PEGUERO replies, “oh, wow.”

243. Later that day, at approximately 7:13 pm, W. PEGUERO called ROLDAN. During the conversation, W. PEGUERO tells ROLDAN that the detectives visit had nothing to do with the recent murder, but “it’s about that other shit.” ROLDAN replies, “oh hell no.”

244. At approximately 7:29 pm, D. LARA called W. PEGUERO and seems to already be aware of the visit by the detectives. W. PEGUERO confirmed that “it’s about that other thing.” The two agree that it happened a long time ago.

245. At approximately 10:12 pm, W. PEGUERO received a phone call from ROLDAN and A. PEGUERO. During the conversation, ROLDAN tells W. PEGUERO to admit he is a Latin King because denying it might be incriminating. W. PEGUERO agrees. They speculate on who may be providing information to the police and ROLDAN tells W. PEGUERO that the police will try to find other D5K associates to build the case. As ROLDAN described it, the police will talk to other people “that they heard was around that situation . . . an' make them niggers flip when they get. 'Cause if they already got one person’s stamp in it, all they need is like one other person to say yeah he was into violence into drugs.”

246. ROLDAN states that this development will require the D5K Chapter to “push back from the nation, for at least, three to six months.” ROLDAN then adds, “we ain't gonna be havin' no meetings. We ain't gonna be gettin' up. We ain't gonna be doin' none of that shit... 'cause you don't know what's gonna happen. You don't know.” W. PEGUERO states he will deny everything. ROLDAN admonishes W. PEGUERO not to deny being a Latin King because

the police can obtain W. PEGUERO's rap videos online in which W. PEGUERO admits he is a Latin King. ROLDAN further coaches W. PEGUERO to pretend he has a poor memory for various reasons, and mimes the false testimony W. PEGUERO would give in such a scenario.

The following is a draft transcript of a portion of the conversation:

ROLDAN: No matter if it was ten years ago or whatever, you better your, like ten years ago that shits hard to remember anything so, if some of you young buddy wanna go yo I did this I think, I don't really know what ten years ago, like me ya normally things I'm like doin' like nigger.

W.PEGUERO: Yeah.

ROLDAN: You from me so it ain't really oh watch [PH] you was doin' that time this, I don't really know like... [laughs]

W.PEGUERO: Yeah.

ROLDAN: Sorry my nigger ten years ago I'm takin' pills too right now.

W.PEGUERO: Yeah, yeah that's exactly that's exactly what [UI] same shit. That's like what I was sayin' [UI]

ROLDAN: You be, you be like nigger I got I got eighteen pertussis pills, I smoke so much weed I got medical marijuana card. Y'all got me like, I don't remember pas' week mind you ten years ago...

W.PEGUERO: [UI]

ROLDAN: I'm sorry y'all. Man that shit act try niggers say like *I'm sorry your honor but I'm sorry I can't remember pas' a week never mind you ten years ago.*

247. ROLDAN then coaches W. PEGUERO and A. PEGUERO to prepare others for any possible visit by the detectives, and not to talk over the phone. The following is a draft transcript of a portion of the conversation:

ROLDAN: You feel me you don't know nigga, but now been you heard about that other shit you like damn. See, you did it the right way, another nigga will be scared bro like, you feel me, like nah, you don't want to get the other brothers like that so you know whatever put them

on, like bro this shit may happen like this, da-da-da, you know after you go through your little process put niggas on that was around cuz you don't want them to get rained down on like that bro because they get rained down on you never know they make say the wrong shit.

W.PEGUERO: [UI]

ROLDAN: Look what, remember what happened, not to put Nene out there, remember what happened to Nene, with the rap shit they fuckin' rained down on him and he didn't know what to do showed up to court niggas to fuckin get in the thing and we lucky niggas told him to plead the 5th and all that shit. You feel me like

W.PEGUERO: Yeah

ROLDAN: We already know whats going on so we gotta hip niggas like you don't wanna hip them to everything but you just in case we get rained down on they don't say no stupid shit like "Uuuuh, yeah, wewas around that time, like yeah, we went to that party".

W.PEGUERO: [to background], yeah, pull up.

ROLDAN: Like you feel me, you don't want nobody saying any stupid shit like that.

W.PEGUERO: Alright, yeah, hell yeah, for sure bro

ROLDAN: *So just nigga be easy nigga and if you do talk about it to anybody don't talk to 'em over the phone don't trust niggas.*

W.PEGUERO: Yeah no, hell no, I'm just gettin' up here

ROLDAN: You feel me, you trust me nigga, you know you can trust me, but nigga don't trust niggas bro.

W.PEGUERO: Yeah.

ROLDAN: [UI] I'm serious nigga. If niggas want to talk with you, naw, you get up in person, I'll smoke a blunt with you. [UI]

W.PEGUERO: Yeah.

ROLDAN: *Do you feel me [UI] nigger 'cause you right now you don't, you don't want spread this shit too much 'cause now you don't know who's who gonna say what...*

248. On 4/11/19, W. PEGUERO, A. PEGUERO, and R. LARA are recorded meeting with CW-3 in CW-3's vehicle and discussing the murder of Victim 41. During the recording W. PEGUERO states, "I was 16 years old, they can't get me with that shit." CW-3 then asks W. PEGUERO, "that shit is long gone right, the thang thang?" W. PEGUERO confirms that it is. "Thang Thang" is slang for a firearm.

249. On 4/16/19, CW-3 captures a second meeting in his vehicle with W. PEGUERO. They continue to discuss the Victim 41 murder. W. PEGUERO stated that a witness told law enforcement that "I let off shots so I must have."

III. Conspiracy to Murder Victim 19

250. On 2/16/18, CW-3 recorded a meeting at the Stony Brook Reservation. RG, J. FIGUEROA, R. LARA, PALACIOS, D. LARA, W. PEGUERO, and A. PEGUERO were present. During the meeting W. PEGUERO issued "one final warning" for all Boston LATIN KINGS members to "fall under D5K."

251. On 2/23/18, CW-3 recorded a meeting at the Charles River Inn. UM, W. PEGUERO, A. PEGUERO, R. LARA, J. FIGUEROA, RG, CALDERON, D. LARA, and PALACIOS were in attendance. During the meeting CALDERON, J. FIGUEROA, W. PEGUERO, A. PEGUERO, and D. LARA discussed "trapping" in "New B." Specifically, FIGUEROA, W. PEGUERO, and CALDERON described assaulting a drug customer during which FIGUEROA punched the individual in the face, knocking him out. W. PEGUERO and CALDERON then described "body slamming" the customer against a wall. At the conclusion of the meeting W. PEGUERO issued a "greenlight" on Victim 19 for not reporting and starting a "renegade chapter."

252. The "greenlight" order for Victim 19 was repeated by W. PEGUERO during a

recorded meeting on 3/23/18, RG, FAMILIA-VALDEZ, J. FIGUEROA, EF, ROLDAN, A. PEGUERO, W. PEGUERO, and D. LARA were present. A. RODRIGUEZ and BARROS called into the meeting from the DOC, which was verified through call records.

253. CW-3 recorded a meeting on 3/30/18, at which D. LARA, EF, PALACIOS, RG, A. PEGUERO, and W. PEGUERO were among those present. W. PEGUERO reaffirmed the “greenlight” on Victim 19, who is identified by nickname, and emphasized the urgency of the order stating that the “State Team is on my back!” W. PEGUERO states that if any member saw Victim 19 they were to “take him in [the] cut (alley) and give him a violation...break his ribs. If he doesn’t take a violation then clap (shoot) him.”

254. Several meetings were held over the following year during which Victim 19’s failure to fall in line was discussed and the “greenlight” was repeated by W. PEGUERO. This was also a topic of calls during the interception of W. PEGUERO’s cellular telephone in April of 2019.

255. On 1/12/19, CW-3 recorded a meeting during which W. PEGUERO, A. PEGUERO, ROLDAN, R. LARA, D. LARA, FAMILIA-VALDEZ, and Angel ORTIZ were among those present. During the meeting, ROLDAN states that saying that Victim 19, and two others, “must report to D5K.” ROLDAN states, “If niggas don’t get down they gunna lay down.” ROLDAN says that D5K members must tell those who are not reporting, but still claiming to be LATIN KINGS, “If you keep throwing up crowns, we are gunna shoot you in the leg.” Finally, ROLDAN instructs them that “Niggas don’t have to wait for DUBB to roll out.” I believe ROLDAN is informing the members that a failure to report to D5K would result in the offenders being killed. ROLDAN’s rejoinder concerning “Dubb,” was meant to stress the fact that D5K Members should commit the violence on their own and not wait for specific

instructions.

256. On 7/4/19, Boston Police responded to the scene of a shooting at Mary Hannon Park in Roxbury, at 10:50 pm. The victim was identified as Victim 19 and had been shot several times. Victim 19 was seriously injured as a result of this shooting. Two individuals were arrested later and charged with the shooting several days later, but it is unknown if they have connections to the LATIN KINGS.

257. ROLDAN was recorded on 10/14/18 saying that he has “two hitters on deck that can move for D5K.” According to CW-3 these are two individuals with no known affiliation with LATIN KINGS who will commit acts of violence at the direction of ROLDAN so the LATIN KINGS avoids detection.

IV. Distribution of Controlled Substances (W. PEGUERO, FAMILIA-VALDEZ, D. LARA, M. RIVERA, A. ORTIZ, A. RODRIGUEZ, O. PENA)

258. The D5K Chapter also distributes controlled substances in order to earn money.

259. During a 3/23/18 meeting, FAMILIA-VALDEZ is recorded saying that he accidentally sold 100 grams of fentanyl to a customer thinking it was cocaine base. At a D5K meeting on 1/23/19, FAMILIA-VALDEZ is captured accusing ROLDAN of owing him \$20,000 for 7 pounds of marijuana.

260. On 3/23/18, D. LARA is captured showing a bag of cocaine base to W. PEGUERO, A. PEGUERO.

261. M. RIVERA was intercepted over court-authorized wiretap engaging in drug deals with F. LOPEZ. Following one of these interceptions, State Police conducted a car stop and recovered 14 grams of cocaine base from M. RIVERA.

262. On 2/23/19, M. RIVERA is captured on video giving CALDERON 1.5 grams of cocaine base.

263. On 6/14/18, CW-3 and ROLDAN went to Angel ORTIZ' house to cut approximately 100 grams of heroin. Angel ORTIZ was present and assisted in processing the heroin.

264. A 10/9/19 recording captures A. RODRIGUEZ in the basement of 358 North Front Street, New Bedford, MA, sitting at a table packaging cocaine base for distribution. During the recording, Jorge RODRIGUEZ states "that's four G's right there off a six-deuce," to which A. RODRIGUEZ replies, "that's not bad at all." Investigators know Jorge RODRIGUEZ to be referring to 62 grams of crack cocaine when he says six-deuce and \$4,000 dollars when he states "4gs," which means that A. RODRIGUEZ can make \$4,000 from breaking down the sixty-two grams of cocaine into smaller quantities for street level distribution.

265. A 11/12/18, recording captured CW-3 purchasing 40 grams of suspected heroin from PENA.

266. A 12/6/18, recording captured CW-3 purchasing 30 grams of suspected heroin from PENA.

NORTH SHORE CHAPTER SELECTED RACKETEERING ACTIVITY

I. Conspiracy to Murder, Witness Intimidation and Retaliation Victim 34

267. In August of 2018, I. RODRIGUEZ and other LATIN KING members conspired to terminate Victim 34 for cooperating with law enforcement. The conspiracy included obtaining paperwork on Victim 34 proving his cooperation with law enforcement and numerous discussions concerning the manner and means by which Victim 34 would be targeted for violence.

268. On 8/20/18, I. RODRIGUEZ, was intercepted calling COTTO. The following is a draft transcript of a portion of the conversation:

I. RODRIGUEZ: Yo, uh I just talked to Big A [(ROLDAN)] and shit...

COTTO: Yeah.

I. RODRIGUEZ: And he said uh, he said niggas supposed to hit me up about that [Victim 34] thing.

COTTO: Yeah, but um I was going to hit you up today and shit, but right now I was um driving to Springfield and shit. I'm on the highway right now (UI). Yo, we gotta deal with him.

I. RODRIGUEZ: Aight, no doubt. Fucking um what he said was that I guess to to to make it seem like um like a all the Firsts need to get up.

COTTO: Yeah, yeah, yeah, yeah, hell

I. RODRIGUEZ: Oh aight.

COTTO: No, we were just start in on him. Nice.

I. RODRIGUEZ: Yeah.

COTTO: You want me, you got a picture of the papers and shit?

I. RODRIGUEZ: Of the what?

COTTO: The papers and shit? Did he send you ...

I. RODRIGUEZ: Oh yeah, yeah, yeah I seen them, I seen them.

COTTO: Yeah.

I. RODRIGUEZ: You, you read them?

COTTO: Yeah, I was reading them about that gun case and shit.

I. RODRIGUEZ: Yeah, I mean it sucks cause at the end of the day, that nigga you know he might not have known that you know that they were there looking for him cause of that (UI/OV) ...

COTTO: (UI/OV)

I. RODRIGUEZ: ... things.

COTTO: (UI) thing, no.

I. RODRIGUEZ: But, but at the same time that nigga all he had to say was I don't know who's car that is, keep it moving. You know what I mean?

COTTO: Yeah, none of that extra shit.

I. RODRIGUEZ: But at the end of the day, he kind of, all the extra shit inviting the nigga in, calming the nigga like yo, that's just a little too much, nigga like ...

COTTO: Yeah, yup.

I. RODRIGUEZ: Should have, should have gave him a cup of coffee too nigga, you know what I'm saying?

COTTO: *Yo, I was saying the same thing. I was reading that, I was like yo this nigga saying too much.*

I. RODRIGUEZ: Yeah.

COTTO: My guys were like the motherfucker wants to say everything himself.

I. RODRIGUEZ: You know what I mean, like hold on here yes car, yeah I know whose car he got, come sit down, take a seat, let me call him. Like nah ...

COTTO: Yeah.

I. RODRIGUEZ: ... shit man. You know what I'm saying?

COTTO: That shit is crazy.

I. RODRIGUEZ: That shit is too much. It should ...

COTTO: Yup.

I. RODRIGUEZ: It should, it should, it should have ended at uh, "No I have no idea sir, have a good night."

COTTO: Yeah. I'm gonna get up with you anyway when I come back, I'll try to take the trip over there and shit, you feel me?

269. I. RODRIGUEZ responded "Aight, no doubt. Fucking um what he said was that I guess to to to make it seem like um like all the Firsts need to get up." I. RODRIGUEZ is

suggesting that in order to assault Victim 34, LATIN KING leaders were to arrange a fake meeting for all the “Firsts,” or local chapter Incas, to attend. Once Victim 34 arrived he would be assaulted. COTTO then asked if I. RODRIGUEZ had received a picture of the “papers,” a term known to investigators to mean law enforcement documents. I. RODRIGUEZ confirmed and they then discuss the circumstances surrounding Victim 34’s cooperation with law enforcement. Based on their conversation it appears that Victim 34 was a witness to a firearm incident and provided law enforcement with information regarding a vehicle involved.

270. On 8/22/18, COTTO sent an outgoing text message to I. RODRIGUEZ, (781) 983-6742, which read “Gm king ADR lissin as soon as I get bk to NB ama hit u up to go handle that.” Seemingly confused about the meaning of this message, I. RODRIGUEZ placed an outgoing phone call to COTTO that same morning. The following is a draft transcript of a portion of the conversation:

COTTO: Yo.

I. RODRIGUEZ: ADR, bro.

COTTO: ADR, King.

I. RODRIGUEZ: What you talking about, that Fitchburg thing?

COTTO: Yeah, you already know. So um, I was just talking to Big A and shit, so um as so-I’m right now I’m Springfield and shit my son’s birthday is the 25th so I just told him right now to find out when the, his, next- ***they next meeting in out there ‘cause me and you gonna out out there, we gonna handle that.***

I. RODRIGUEZ: Yeah, but- we shouldn’t- we don’t even probably have to go out there step foot in Fitchburg to handle that. Don’t they got a full chapter out there?

COTTO: Yeah, yeah, yeah. They gotta whole chapter out there, but he just want- he want me- Big A want me to be present, you feel me?

I. RODRIGUEZ: Oh for real?

COTTO: Yeah, he just want me to be out there and shit 'cause he's already telling me like, "Yo if you want I'll just call Izzy and I'll roll down there with Izzy," and I'm like, "Yo, aye, chillax my nigga. Stay sittin down where you at, let me know when their next meeting is at." 'Cause he told me he's like, "I think they having a meeting." They wanna blow him up already, you feel me?

I. RODRIGUEZ: That's what I mean. We should just, we should just, we should just let them do their own thing. Let them- you know what I mean? At the end of the day, it's something to do with with with their chapter.

COTTO: Yeah.

I. RODRIGUEZ: *So we- you know, the way I see it is- and I mean I understand where Big A's coming from- he wants to make sure it's done, and you know, have it seen done, you know what I mean?*

COTTO: Yeah.

I. RODRIGUEZ: But at the end of the day, if we can't confide in these chapters to handle their own in-house shit sometimes, nigga, then what- you know what I mean? They're never gonna be able to stand on their own two feet.

COTTO: Yeah, yeah.

I. RODRIGUEZ: You know what I mean? They gotta- they gotta strong enough chapter to where, as soon as they take him out, they can replace him and the structure moves on. *Then they should- we should be able to let them niggas break that nigga themselves and X that nigga themselves.*

COTTO: Yeah, that's true. That's true.

I. RODRIGUEZ: You know what I'm saying? That way- that way niggas don't even have to, you know, go out their way, go all the way the fuck to Fitchburg to handle that shit or see it through. You know what I mean?

COTTO: Yeah. Yeah that's true. Well, um, fuckin then I don't know-

try to see- try to see- lemme them give Big A a call, tell him, tell him how you feel, what you thinking about it, and that's it.

I. RODRIGUEZ: Yup.

COTTO: Should be like, "Yo I'm speaking to Gordo about it, I'm telling him that it should be better for this way- this way"

I. RODRIGUEZ: Yeah, 'cause at the end of the day, that nigga- that nigga (OV)-

COTTO: He's probably- he probably just want me to be present 'cause he feel me this is my region, you feel me? So he's probably like, you feel me? Go let them know that (PH) the ok it's a go, you feel me?

I. RODRIGUEZ: Yeah, yeah, yeah, yeah.

COTTO: So, I-I don't know. I told him I don't got no problem going out there. I'll drive down there, I don't even give a fuck. It is what it is. I already got my inspection ticket on. I got everything on my truck, so I'm ready to go. It is what it is.

I. RODRIGUEZ: No doubt, no doubt. But yeah, I mean I don't-I don't mind going either. You know what I mean? But at the end of the day I don't know- I feel like we shouldn't have to, nigga, like them them niggas should be able to blow that nigga up.

COTTO: Yeah, that's true.

I. RODRIGUEZ: And-and-and call it a wrap. You know what I'm saying?

COTTO: Yeah, that's true. Fuckin give Big A a call and then call me back.

I. RODRIGUEZ: 'Cause at first- didn't niggas wanna get that nigga at the same time or some shit?

COTTO: Yeah.

I. RODRIGUEZ: So I mean if niggas and I mean I spoke to Big A the other day, and he ain't on that, you know? He's like "I just want that nigga blown up, and T'd," you know what I'm saying?

COTTO: Yeah.

I. RODRIGUEZ: So I mean, nigga there's no point- we ain't going out there to fucking come back richer.

COTTO: Yeah. That's true. I don't know- try to see what Big A thinks about what you- your idea is, you feel me? That's why you there too, you feel me? You're a help my nigga- at the end of the day, you know what I mean?

I. RODRIGUEZ: Alright.

COTTO: ***I don't give a fuck. I'll go out there and blow up- I told him myself, I told him I don't even need nobody. I need me, Izzy, and like two brothers, bro. We would blow this nigga and trust and believe he's gonna get- he's gonna get blown.***

I. RODRIGUEZ: Yup. But aight- yeah, yeah, I'll see what's good. I'll hit him up. When you- when you planning on going out there?

COTTO: Well I'm- that's what I'm saying. He told me- the chapter up there ready- they-they-they ready to handle him, you feel me? But he want me to go up there, so like I told him I was like, "Listen (UI)" 'cause he tossed it to me like "Yo they're gonna have a meeting, they- they gonna have a meeting themselves, so that would be the perfect day basically that all the brothers is there, niggas is there, they get shit turn up, you feel me?"

I. RODRIGUEZ: Yup, yup.

COTTO: ***So I think that was his plan that he wanted it better when the meeting was there 'cause I coulda just blow him up. Pop up and blow him up, you feel me?***

I. RODRIGUEZ: Yup, yup, yup.

COTTO: So the best idea then, and everything the best idea is you either- either we show up over there- me, you, and like two brothers from-from-from security that you got and go over there, make sure shit's done the right way- everything's good. And shit, go back home in a happy way. Finish with Big A 'cause Big A- you know Big A got something with rats and all this shit. Big A- I don't know, he's stressed out for that shit, nigga. He ready to- he trying to have this nigga blowed up already.

I. RODRIGUEZ: Yeah, yeah, yeah.

271. According to COTTO, ROLDAN instructed him to go out to Fitchburg to “handle that,” referring to the termination of Victim 34. I. RODRIGUEZ discusses allowing the Fitchburg Chapter to handle the assault themselves, stating “they got a strong enough chapter to where, as soon as they take him out, they can replace him and the structure moves on,” and COTTO suggests that I. RODRIGUEZ call ROLDAN himself. I. RODRIGUEZ stated “I spoke to Big A the other day, and he ain’t on that, you know? He’s like “I just want that nigga blown up, and T’d.” Investigators know T’d to be short for termination. The conversation concludes with I. RODRIGUEZ stating that he will contact ROLDAN to discuss letting the Fitchburg chapter Enforcer handle the assault, and then he will follow up with COTTO.

272. On 8/22/19, I. RODRIGUEZ again called COTTO. During the call, I. RODRIGUEZ states that he spoke with ROLDAN, who stated that he did not want the Fitchburg Chapter to handle the assault of Victim 34. The following is a draft transcript of a portion of the conversation:

COTTO: Yo. Yo.

I. RODRIGUEZ: Yo.

COTTO: What’s good, man?

I. RODRIGUEZ: Yo so I guess um basically what he said was umm, he didn’t want Fitchburg doin’ it.

COTTO: Yeah that’s what I was trying to say I think he just want us to do it ‘cause he want us to be there, and do it ourselves.

I. RODRIGUEZ: Well-well-well he said with Fitchburg umm, what he said, he said you know [Victim 34] got a few different sides to him, you know. Niggas don’t know whether he’s-he’s you know a teller-teller, or you know, he’s a little shady with it.

COTTO: Yeah.

I. RODRIGUEZ: So he didn't want- he didn't want his chapter doin' it and then, you know what I'm saying? And him throwing some shady shit on the chapter, you know what I mean?

COTTO: Yeah, yeah, yeah.

I. RODRIGUEZ: 'Cause where they-they the ones that are gonna have to deal with the aftermath after-

COTTO: Yeah, yeah, yeah.

I. RODRIGUEZ: You know what I'm saying?

COTTO: So we in, it is what it is.

I. RODRIGUEZ: So he said- he said we go out there with a few brothers from, you know, maybe two brothers from this chapter, two brothers from that chapter, two brothers from Boston. And fuckin, before the meeting get in that- you know what I mean? Break that nigga's shit.

COTTO: Yeah, I'm down with that. I'm with it. I'm just gonna tell him to let me know when is the meeting so we can pull up.

I. RODRIGUEZ: Yeah and then he said something about um, he had told him that all Incas from every city are gonna be gettin' up or some shit like that [OV].

COTTO: Yeah he have- (OV)

I. RODRIGUEZ: To set it up that way. That way he thinks he's coming to a meeting with all Incas and (UI)-

COTTO: That's what I told him. I told him, "Izzy told me it's better off just making it seem like, like it's a it's a Inca meeting, that we all having a meeting and that we- they gotta show up and that's it.

I. RODRIGUEZ: Yup, yup. So yeah, that's what is.

COTTO: Dale pues. Esta bien- [Ok then, that's fine] I'm gonna let you know the day that they having the meeting so I can get up with you and so then we can have whoever's with us and then go down there.

I. RODRIGUEZ: Yeah. He just said he's gonna-he's gonna let me know a date, too. He's gonna figure it out, but he said he's even down to ride out there with us.

COTTO: Aight, so say less so we in there all of us..

I. RODRIGUEZ: Yeah, fuck it. Do whatever we gotta do.

COTTO: Dale, so just expect my call or his.

I. RODRIGUEZ: Aight, no doubt. ADR.

COTTO: Aight, ADR, bro.

273. In this conversation, I. RODRIGUEZ suggests that he and COTTO will handle the termination with other members not from Fitchburg.” COTTO agreed, and I. RODRIGUEZ mentioned that ROLDAN had told already laid the seed of the ambush by telling Victim 34 that “all the Incas from every city are gonna be gettin’ up or some shit like that.” They discuss when the assault will occur and I. RODRIGUEZ stated that ROLDAN will let him know a date and that ROLDAN will attend as well. COTTO responded “Aight so say less so we in there all of us.” I. RODRIGUEZ responded “yeah, fuck it. Do whatever we gotta do,” affirming the plan.

274. On 8/31/19, I. RODRIGUEZ contacted COTTO. After a conversation regarding unrelated LATIN KING matters, I. RODRIGUEZ states, “Aight no doubt, and then also umm I don’t know if you already got word that ahh...[Victim 34], [Victim 34], Fitchburg was already handled.” COTTO responded “Ya, he already handled.” I. RODRIGUEZ adds, “Ya, ya, so I guess, I guess Pluto, Pluto’s out there got that Inca position now.” Investigators know “Pluto” to be M. RIVERA, and know that he took over the Fitchburg chapter Inca position after Victim 34 was “handled,” or terminated.

NEW BEDFORD SELECTED RACKETEERING ACTIVITY

275. A 12/10/18 recording made by CW-9 captures the coordinated LATIN KINGS

beating of unidentified male in a garage for the offense of spreading rumors concerning Jose RODRIGUEZ and MEDINA. MEDINA, MENDEZ, VALENTIN-SOTO, COTTO, Jorge RODRIGUEZ, and Jose RODRIGUEZ, are present for the beating. RUIZ and YLT observed the beating of this individual through the surveillance system of the garage. During the beating, COTTO picks up a baseball bat and swings it at the victim, making contact with his head. Multiple other persons punch and kick the individual.

276. A 2/3/19 recording, where Jorge RODRIGUEZ, Jose RODRIGUEZ, COTTO, Liu-Torres, VALENTIN-SOTO, Jose VASQUEZ, MEDINA, JORGE, LUGO, and RUIZ were present, captures a discussion of a physical assault of an individual who I will refer to as Victim 24. Jorge RODRIGUEZ states he ordered the assault, and had the whole chapter “eat at him,” meaning assault Victim 24. During the recording, Jorge RODRIGUEZ describes how bad the beating was, and that Victim 24 could not breathe. Jorge RODRIGUEZ states that YLT, and MEDINA also participated and that MEDINA had blood on his shirt. MEDINA admits he had blood all over his shirt when they assaulted Victim 24. VALENTIN-SOTO states he always eats and does not let his lions eat alone. Investigators know “eat” to mean, in this context, participate in a beating. The group also discusses how RUIZ confronted Victim 24 first and how it escalated from there.

277. Juan FIGUEROA, a/k/a KING PUNG was previously a member of the D5K Chapter, but moved to New Bedford in order to make money distributing drugs at LATIN KINGS trap houses. FIGUEROA is rap artist whose lyrics and music videos contain vivid depictions and descriptions of the LATIN KINGS racketeering activity, feuds, violence, and drug distribution. These lyrics and videos contain elaborate displays of LATIN KINGS symbols, clothing and paraphernalia, depict numerous members making gang signs, and are replete with

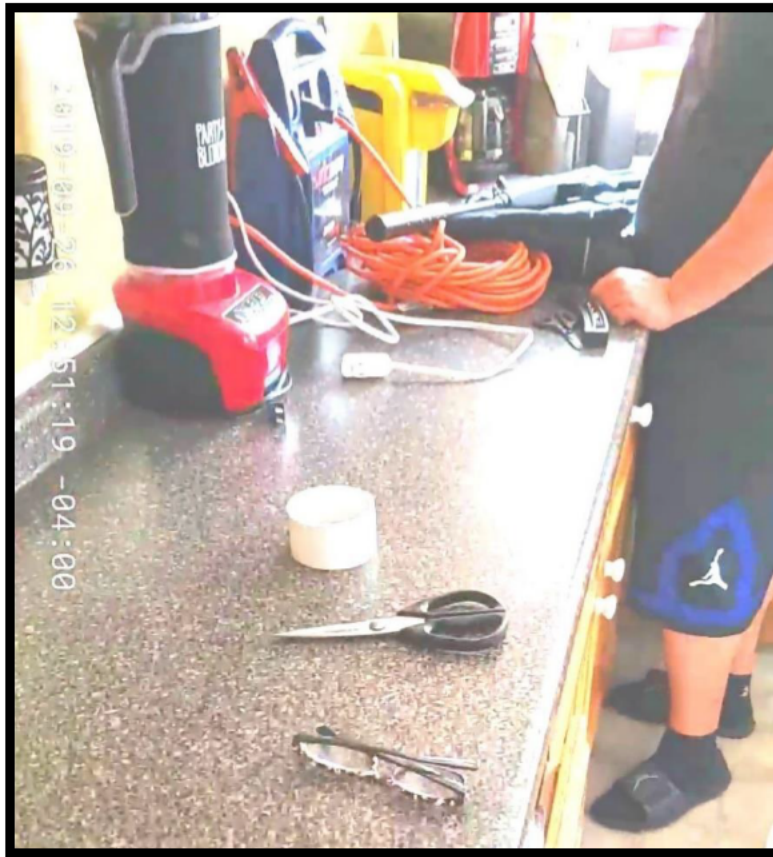
open references to the LATIN KINGS enterprise and threats to rivals, snitches, and others in bad standing with the LATIN KINGS.

278. New Bedford Police reports describe an incident on 3/29/19, involving the arrest of Jose VASQUEZ and E.M. for state offenses. On that date, New Bedford Police executed a search warrant at 24 Bentley Street, Apartment 3S, New Bedford, MA. As part of the search warrant, Jose VASQUEZ and E.M. were observed leaving 24 Bentley Street and entering a cab that travelled to Bullard Street and North Front Street in New Bedford, when it was stopped by police. During the search of the residence, police found a Rossi .44 caliber revolver, and 37 rounds of .22 caliber ammunition.

279. A 8/14/19 recording captures the gang initiation, or “crowning” ceremony of Yuen Liu-Torres, a/k/a King Chino, wherein Liu-Torres was made a full member of the LATIN KINGS by Jorge RODRIGUEZ, who “blessed” him into the LATIN KINGS. Present for this meeting were the following: Jorge RODRIGUEZ, RUIZ, SANTIAGO-TORRES, CARRASQUILLO, FELIX-RIVERA, VARGAS, LUGO, Jose VASQUEZ, Jose RODRIGUEZ, GUADALUPE, VEGA, JOHNSON, COTTO, JORGE, and other members.

280. On 9/26/19, a recording captured at 211 Tremont Street, New Bedford, MA, depicts Jorge RODRIGUEZ purchasing a .22 caliber MP5 submachinegun with attached silencer from CALDERON, A.VELAZQUEZ, and PENA for a price of \$1,200. During the recording, VARGAS is present, and Jorge RODRIGUEZ can be seen holding the MP5. At one point, CALDERON asks Jorge RODRIGUEZ, “It ain’t loaded right?” RODRIGUEZ can be seen removing the clip from the gun. A. VELASQUEZ states “That’s basically it, MP5.” CW-9 suggests that they test the weapon in the basement. CALDERON replies, “I don’t recommend that in the basement,” to which CW-9 replies, “[i]t don’t make no noise.” CALDERON then

states, "It don't make no noise, but it's not recommended, you gonna have to chase the shell casings... It's going to spit it out... Can't leave the evidence down there." A still image from that recording follows:



281. On 12/5/19, agents executed a search warrant at 103 Maple Street, New Bedford, MA, and located the firearm purchased on 9/26/19. This location was identified to be a storage of location for JORGE RODRIGUEZ's firearms.

282. A 10/15/19 recording captures the violent termination of Jose VASQUEZ, a/k/a KING FEARLESS, which took place at 104 Tallman Street, New Bedford, MA, in the detached garage on the property that is controlled by Jorge RODRIGUEZ. According to CW-9, Jose VASQUEZ was terminated from the LATIN KINGS because he had sexual relations with the then-girlfriend of LATIN KINGS member, N. VELAZQUEZ, a/k/a KING NAEL. According to

CW-9, it is forbidden by LATIN KINGS law to sleep with the woman or man of another LATIN KINGS member. The recording depicts CW-9 entering the garage of 104 Tallman Street to find several LATIN KINGS members. RUIZ walks into the garage with CW-9. Jose VASQUEZ is visibly unconscious and recovering on the floor of the garage with Jose RODRIGUEZ, standing over him. During the recording, Jorge RODRIGUEZ can be heard yelling at a probationary member of LATIN KINGS, RR, and ordering that RR be beaten by LATIN KINGS members for lying about knowing that Jose VASQUEZ slept with N. VELAZQUEZ's girlfriend. CW-9 intervened, fearing that the other LATIN KINGS members would continue beating Jose VASQUEZ until he was dead. According to CW-9, Jose RODRIGUEZ, N. VELAZQUEZ, and COTTO took part in the beatings of Jose VASQUEZ and RR.

I. Conspiracy to Murder Victim 9 (FIGUEROA, JOHNSON, CARRASQUILLO, GUADALUPE, Jose VASQUEZ, Jorge RODRIGUEZ, COTTO)

283. Investigators learned of an ongoing conspiracy by LATIN KINGS members to murder an individual who I will refer to as Victim 9. According to CW-9, Victim 9 was targeted because he was distributing narcotics in New Bedford that were not acquired from Jorge RODRIGUEZ. According to CW-9, at some point in 2017 Jorge RODRIGUEZ sought permission from CECCHETELLI to kill Victim 9. CECCHETELLI informed Jorge RODRIGUEZ to "handle it" as long as the murder was "justified" under the rules of the LATIN KINGS. CW-9 stated that Jorge RODRIGUEZ wanted to kill Victim 9 in order to eliminate his drug competition, but told CECCHETELLI that Victim 9 had committed treason against the LATIN KINGS in order to justify the murder.

a. June 19, 2017, Armed Assault with Intent to Murder Victim 9 and Victim 10 (COTTO)

284. On 9/24/18, CW-9 reported that an attempt to kill Victim 9 took place in 2017,

approximately two months after the meeting between Jorge RODRIGUEZ and CECCHETELLI concerning permission to murder Victim 9. CW-9 reported that there was a shootout in the area of North Front Street and Tallman Street in New Bedford as part of this attempt to kill Victim 9. CW-9 stated that he learned about the shooting because COTTO, FELIX-RIVERA, “Justin” and Anthony Rivera all ran into 358 North Front Street, New Bedford, MA, after the shooting, and spoke with CW-9 about their involvement.

285. According to CW-9, LATIN KINGS members learned that Victim 9 was in the area of North Front Street and Tallman Street with his sister, who I will refer to as Victim 10. LATIN KINGS members confronted Victim 9 at which point Victim 10 “dipped the crown,” insulting the LATIN KINGS. According to CW-9, FELIX-RIVERA, COTTO, another LATIN KINGS member, and an individual known to CW-9 as “Justin” opened fire at Victim 9 and Victim 10. According to CW-9, COTTO had an assault rifle. COTTO complained to CW-9 that when he fired it, the rifle jammed after firing only one shot. According to CW-9, Victim 10 also had a weapon and fired back. CW-9 reported that an unknown male and female who were not involved in the incident were injured. According to CW-9, FELIX-RIVERA was crowned as a full LATIN KINGS member for this incident. According to CW-9 on 9/24/18, “Justin” and a female identified as “Christine” were then incarcerated for this incident.

286. Investigators obtained New Bedford Police report #17-7371 that described an incident taking place on 6/19/17, in the area of 50 Tallman Street, New Bedford, MA, which matches the circumstances reported by CW-9. According to the police report, an innocent victim, Victim 20, who was inside the residence was struck in the neck by a single bullet fired from outside that had penetrated through the exterior wall and into the residence. Police located numerous shell casings. Directly in front of 329 North Front Street, New Bedford, MA, a single

.223 caliber shell casing¹⁹ and four .22 caliber casings were found. In the rear yard and driveway of 329 North Front Street, four .40 caliber casings, and four 9mm casings were recovered.

287. A witness identified J.O. to have been carrying a rifle with a long barrel, and stated that J.O. pointed the rifle in the direction of persons who were standing nearby. Police identified Victim 9 and Victim 10 as being the intended target.

288. I learned from court records that J.O. and E.H. were indicted in Bristol Superior Court for this shooting (Docket No. 1773CR000456 and 1773CR00457), but the case was dismissed on a scheduled 12/10/18 trial date.²⁰ According to the docket sheet, the Court ordered dismissal on 12/10/18 because “the case has twice been called into trial and the District has been unable to proceed on either date because the District cannot locate an essential witness. Case is Dismissed without prejudice.” I noted from the docket that the prosecutor sought a capias for a witness, who apparently was not successfully located.²¹

¹⁹ I know that the .223 caliber is a common rifle caliber.

²⁰ Consistent with CW-9 descriptions of the persons being incarcerated, E.H. and “Justin” were initially was held in custody on the case on grounds of dangerousness. According to the court papers, E.H. was detained until approximately 9/17/18, when a cash bail was set. It appears that E.H. posted the cash bail because she later sought modification of release conditions.

²¹ I also noted from the court papers that E.H. filed a pro se motion on 2/22/19, seeking to copy the contents of her court file. The pro se motion notes that E.H. wants to “copy my files,” because she “just would like to keep track of my files personally.” I believe this motion is associated with the LATIN KINGS practice of acquiring paperwork on persons who provide information to law enforcement in order to document their cooperation. In this case, it is my belief that the request to copy the file would be to obtain paperwork identifying witnesses, including the witness who could not be located on the trial date. I know from the court papers that the name of at least one civilian witness is stated in papers filed in the case.

b. June 19, 2019, Armed Assault with Intent to Murder (FIGUEROA, JOHNSON, CARRASQUILLO, GUADALUPE, Jorge RODRIGUEZ, Jose VASQUEZ)

289. CW-9 reported that during the week of 6/17/19, FIGUEROA, JOHNSON, GUADALUPE and CARRASQUILLO, attempted to murder Victim 9. According to CW-9, JOHNSON's girlfriend operated a vehicle, and FIGUEROA was a passenger in the vehicle, and that FIGUEROA fired a gun at Victim 9, getting off one shot before his gun malfunctioned. According to CW-9, Victim 9 was not hit. Later that same day, CW-9 learned that CARRASQUILLO and GUADALUPE located Victim 9, and fired at him, striking an associate of Victim 9 in the shoulder, who I will refer to as Victim 11. According to CW-9, Victim 11 went to Providence Hospital for a gunshot wound.

290. A 6/19/19 recording captured Jorge RODRIGUEZ and CW-9 questioning FIGUEROA, Jose VASQUEZ, and JOHNSON about shooting Victim 9 earlier that day. FIGUEROA indicates he did not want to use a car for the shooting, and states that JOHNSON decided to use a vehicle and involved JOHNSON's girlfriend as the driver. Jorge RODRIGUEZ stated during the recording that the shooting "should have been one shot, one hit." FIGUEROA states on the recording: "I know what you all talking about, but trust me it wasn't... It was... personally I would walk so. That's all I know. I do it the way I do it in the hood. Niggas don't even shoot out of the vehicle. You know what I'm saying? So..." Then later in the recording, FIGUEROA describes the circumstances of why he missed Victim 9: "Listen, listen, because it wasn't directly like oh, I'm clipping these niggas. No. I went to go clip niggas that was right here, the niggas like yo. I say, yo what? BOOM and I blicked towards whatever was (unintelligible) the niggas that was in that, niggas was in the woods like this. In the cut, behind the trees niggas. So it wasn't like I was directly trying to aim at them or nothing. You feel me?"

c. September 2, 2019, Trial of Victim 9 and Philly (VEGA, Jorge RODRIGUEZ, SANTIAGO-TORRES, Jorge RODRIGUEZ, Jose RODRIGUEZ, Jose VASQUEZ, COTTO, JOHNSON, VARGAS, FELIX-RIVERA, CARRASQUILLO, GUADALUPE and MEDINA)

291. According to CW-9, Victim 9 went to Connecticut with an associate named “Philly” to ask a LATIN KING member for assistance with the outstanding kill on site order issued against him by Jorge RODRIGUEZ. Philly had been in federal prison with Pappas. Pappas called CECCHETELLI who referred him to CW-9. Ultimately, a trial was set in order to resolve the outstanding issues with Victim 9 and the New Bedford Chapter. On 9/2/19, CW-9 recorded the trial of Victim 9 and Philly in Meriden, CT. Hector VEGA, a/k/a KING DEMON was the Crown Council Chairman presiding over the trial along with other Meriden, CT, LATIN KINGS members.

292. Numerous New Bedford LATIN KINGS members attended the trial, travelling to Meriden, CT, in a passenger van owned by Jorge RODRIGUEZ that is registered in the name of Tyson JORGE. This van is a 2006 white Ford E-350, VIN: 1FBNE31L56DA19618. Among the New Bedford Chapter members attending the trial were SANTIAGO-TORRES, Jorge RODRIGUEZ, Jose RODRIGUEZ, Jose VASQUEZ, COTTO, JOHNSON, VARGAS, FELIX-RIVERA, CARRASQUILLO, GUADALUPE and MEDINA.

293. During the trial, Victim 9 was accused of various offenses, including not reporting to meetings and of putting a gun to fellow LATIN KINGS member, TM, a/k/a King Trio’s head. At the close of the trial, VEGA found Victim 9 and Philly guilty and wanted to terminate them. Specifically, VEGA and other members of the Connecticut LATIN KINGS wanted them to be killed. CW-9 stops the LATIN KINGS from rendering a judgment of death, telling them, “we’re not catching no bodies.”

294. Philly is given a Pumpkin Head, which is a beating from head to toe, and Victim 9

is given a violation “in the legs,” because he’d been recently stabbed and would get a full Pumpkin Head later when he was recovered from the stab wound. The LATIN KINGS members participating in the beatings of Victim 9 and Philly included, COTTO, JOHNSON, SANTIAGO-TORRES, FELIX-RIVERA and MEDINA. Before the beating, Jorge RODRIGUEZ can be heard calling members to join in the beating, and starts the assault by stating, “Ready, ADR.” During the assault, Jorge RODRIGUEZ can be heard encouraging his subordinates, “Eat, eat...” At one point, Jorge RODRIGUEZ can be heard stating “Izzy, hold him up,” meaning for FELIX-RIVERA to hold up the individual being beaten.

II. May 29, 2018, Attempted Murder and Armed Assault with Intent to Murder of Victim 2, and Victim 3, and Witness Intimidation (MENDEZ, Jose VASQUEZ, Jorge RODRIGUEZ)

295. According to New Bedford Police reports, on 5/29/18, at approximately 6:00 P.M., New Bedford Police were dispatched to the area of Sawyer Street and Belleville Avenue for a report of shots fired. The New Bedford ShotSpotter system indicated that four rounds had been fired in the area of Sawyer Street. Shell casings were later found in the area.

296. The two victims of the shooting, Victim 2 and Victim 3, were identified as having been admitted to Saint Luke’s Hospital. According to the victims, they were exiting a residence at 20 Holly Street, New Bedford, MA, and heading to one of the victim’s vehicle, when they heard a rush of footsteps. They picked up the pace and quickly entered the vehicle.

297. According to the victims, about six or seven LATIN KINGS gang members then surrounded them, and started hitting and kicking the car. At one point, one of the individuals pulled out a firearm, and aimed it at the victims. The victims heard gunfire; a bullet went through windshield, and into the backseat. The victim felt a burning in his abdominal area, where he later learned he had been shot. The other victim was driving, but had also been shot, and suffered a

gunshot wound to his upper arm.

298. The victim put the vehicle into reverse, sped away from the group and headed to the hospital. As they neared Purchase Street, the vehicle was no longer operable, so they stopped and called a cab that took them the rest of the way to the hospital.

299. Later, police learned that the tires to the victim's vehicle had been slashed. By puncturing the tires, LATIN KINGS members intended to stop the vehicle from fleeing and clearly intended to execute the victims with the gunfire. Photographs of the four bullet holes to the vehicle follow:



300. Further interviews determined that local LATIN KINGS members were

confrontational with one of the victims. The victim stated that he had previously confronted drug users and called police to report ongoing issues in the neighborhood.

301. A neighbor's surveillance system captured the shooting on video. According to the police report, MENDEZ, XQ, a/k/a King Xavi,²² and Jose VASQUEZ, can be seen as part of the group of LATIN KINGS members who chase the victims to the vehicle, and surround it: XQ can be seen stabbing the tires of the vehicle, Jose VASQUEZ can be seen kicking the driver's side of the vehicle causing damage, and MENDEZ can be seen kicking the front fender of passenger side. Another identified LATIN KINGS member, Jayco REYES-SMITH, was identified by the police to be the individual holding the firearm and shooting at the victims. A warrant was issued for REYES-SMITH's arrest shortly after the incident, but he is believed to have fled the state. Still images depicting the MENDEZ kicking the front passenger-side fender and REYES-SMITH holding the gun follows:

²² XQ is believed to have been arrested as part of a Pennsylvania case charged in March 2019, with other New Bedford members, including EM, a/k/a King JuJu. XQ was charged with this 5/29/18 incident, but the case was later dismissed (Docket No. 1833CR002829).



302. On 12/20/18, Jose VASQUEZ was convicted of malicious damage to a motor vehicle in New Bedford District Court in relation to this crime and sentenced to 18 months of incarceration with 6 months to serve and probation until December 2019 (Docket No. 1833CR002827).

303. Pursuant to a court-authorized intercept, MENDEZ and Jorge RODRIGUEZ were captured on 11/15/18 discussing the incident with Jayco REYES-SMITH, a North Carolina LATIN KING member, who was formerly in New Bedford to sell drugs in the trap houses. CW-9 has identified REYES-SMITH as a member of the LATIN KINGS.

304. In the interception, the parties discuss the fact that the video does not depict their faces with sufficient clarity for prosecution. MENDEZ states: “you can’t even tell it was me, my nigga.” Furthermore, the parties discuss how MENDEZ has already spoken with the victims and persuaded the victims to not identify them. The following is a draft transcript of a portion of the conversation:

MENDEZ:	Hey, yo, hey, yo. Hey, yo, listen, right? Don't listen to this nigga, this nigga's a fucking bum-ass nigga. Hey, yo. Fucking, nah. They don't really, they don't have anything.
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Yo. You know what I'm saying? The video don't show anything, it doesn't show you and shit, nothing.

REYES-SMITH: Bro, what I want to know, what I want to know is how they got my name off the rip.

MENDEZ: Because, because it was--

REYES-SMITH: There was, there were bros, nigga, there were only certain bros, and, and my, my whole entire name, nigga. Feel me?

MENDEZ: Yeah, you, you had already been arrested here.

REYES-SMITH: You had been--

MENDEZ: I asked about that. I asked about, I didn't ask, but I asked myself about that. Like, like, when, when, when, they arrested me, they already-- for me, you, and, Fearless²³, and Xavi, you heard?

REYES-SMITH: Yeah.

MENDEZ: And your name was already, already on the police report, you know what I'm saying?

305. The conversation then continues on to encompass intimidation of the victims.

MENDEZ indicates that the video does not depict them with sufficient clarity to make an identification. Both MENDEZ and Jorge RODRIGUEZ describe their efforts to persuade the victims not to come to court. The following is a draft transcript of a portion of the conversation:

RODRIGUEZ: Hey, hey, hey, what he's trying to say, what he's going to tell you, what he, what he's going to tell you is, what he's going to say is, *in the video, your face doesn't show*. You understand me? So that's why, he came, he came by, he came by the house already tonight and I don't trust that shit. That, that, that, that, this, that's his recorder, and I was talking, and he moves up with the whole fucking case and

²³ This is a reference to Jose VASQUEZ. I know from the police report that MENDEZ, Quinones, REYES-SMITH and Jose VASQUEZ were identified in the police report by name. MENDEZ is likely referring to XQ and Jose VASQUEZ, the other two LATIN KINGS members named in the report.

the fucking, what he should of [voices in background] I'm not telling him shit.

REYES-SMITH: Look, look, forget that, forget that, but look, I, maybe it's true that Cabeza went to jail again?

RODRIGUEZ: Yeah, yeah, yeah. Cabeza, Cabeza is going to be out too.

REYES-SMITH: Alright.

RODRIGUEZ: *And, and the witness is not going to court either.*

REYES-SMITH: (UI) what I have to do is finish getting the money to get a lawyer for when I get there, I can talk to a lawyer, man.

RODRIGUEZ: Yes, If you [stutters] if you turn, if you turn, if you turn yourself in, right? And, and you, and they probably won't, they probably won't even give you no house arrest, or nothing, and you, and you probably could be, and your bail will probably be low, you know what I mean? Because you turned yourself in. If the police arrest you...

REYES-SMITH: They aren't going to give me bail because, remember, I'm on probation, dude. I'm going (UI) whatever, but I'm on probation If they charge me with that.

RODRIGUEZ: True, true, true, you have your probation, right?

REYES-SMITH: For real, that's, that's for four years.²⁴

RODRIGUEZ: Four years?

306. MENDEZ then returns to the line and discusses the case. The following is a draft transcript of a portion of the conversation:

MENDEZ: Yeah. What's goody, my nigga?

REYES-SMITH: My nigga, you're fat, you're skinny--

MENDEZ: Nah, nigga, I'm good, my nigga. I'm not fat, I'm skinny, still the same, nigga. I don't change, nigga.

²⁴ At the time of this call, REYES-SMITH was then on probation for a series of cases from Taunton District Court. See Docket Nos. 1631CR000314, 1631CR000540

REYES-SMITH: Alright, nigga Yo, I love you, nigga,

MENDEZ: Yo, You got to come down here, you heard, my nigga? You got to come down here, you heard?

REYES-SMITH: Yeah, nigga, but nigga, After fucking, I want to go down there, nigga, I got to, I got to, I want to finish getting the money together for my lawyer, nigga, so when I get down there, I have a lawyer already.

MENDEZ: Yeah. I'll help you with that if anything. You heard? And, and, and, um, you might have to do, the most you might have to do, is about, um, um the four months for the dangerous, and then we'll be able to bail you out and shit.²⁵

REYES-SMITH: Nah, nigga, but yeah, I, I remembered I have fucking probation, so I could see if the probation won't violate me. You feel me?

MENDEZ: They might, yeah, because, because you ran, they might want to violate you and shit, but, um, you be good, bro, you be good. As far as this case, as far as this case, nigga, you're going to be fine. You know what I'm saying? We are going to be good.

REYES-SMITH: I was telling you, nigga, I told Future (PH) that shit, I told Future (PH), nigga, if they give you bail, nigga. He knows, no, do you feel me, they're gonna drop that shit, if they give you bail, my nigga, cause, you, you worked there [PH][cuts out] my nigga, so ...

MENDEZ: Yeah, yeah, that's what I'm saying, like, I-I, I thought they was going to give me no bail, my nigga. You know what I'm saying, but, they ended up giving me like a 10,000.²⁶

²⁵ I believe MENDEZ is referring to the practice in New Bedford District Court relative to dangerousness hearings under Mass. Gen. Laws 276, § 58A. Under that statute, an individual may be ordered detained for 120 days before trial. Judges have a practice of setting a cash bail at the conclusion of the 120 days, and MENDEZ is referencing the fact that this will likely be outcome for REYES-SMITH's case after the 120 day period has been exhausted. This in fact happened to MENDEZ's case (Docket No. 1833CR002828). Once his period of dangerousness concluded, a \$10,000 bail was set. MENDEZ was released after posting the \$10,000 bail when he was rearrested in February 2019.

²⁶ On 10/24/18, MENDEZ petitioned for review of his district court bail to the Superior Court. After originally being set at \$25,000 in the district court, Justice Mark Hallal reduced the

My lawyer, my lawyer freaked and my lawyer talked to me about the case, my nigga. They ain't got shit. He's like, "I've got this shit beat, my nigga." You know what I'm saying? The video doesn't show the ... The video looks good, right? ***The video looks awesome, but, but you can't tell who is who.*** You can't tell, like this is ...

REYES-SMITH: The video is from the house, right, not from the [cuts out] North Shore (PH), right?

MENDEZ: Yup, yup.

REYES-SMITH: Alright.

MENDEZ: Yeah, you, you seen it before?

REYES-SMITH: Yeah, nigga, I seen it.

MENDEZ: Yeah, I say look, hell, nigga! [laughs]

REYES-SMITH: I'm saying, nigga, that, that I don't fucking, I don't like, you can't see nothing in that shit, bro.

MENDEZ: Yeah, you can't anything. You know what I'm saying? That's, that's why, that's why, my lawyer was like, "***Yo, you can't even tell it was me, my nigga.***" You know what I'm saying? He said, "Yeah, it could be anybody." ***The only way that we're fucked is if the witnesses go to court. And I already talked to them and shit, my nigga. I talked to both of them and shit, nigga.***

REYES-SMITH: And so, what--You talked to them?

MENDEZ: Yeah, nigga, yeah, hell yeah, nigga.

REYES-SMITH: Wow.

MENDEZ: ***I was, I was in prison with the brother. The brother, because they snitched a little on the paperwork, right? So I talked, I talked to, to the brother, you know what I'm***

cash bail to \$10,000. After being arrested again in February 2019, MENDEZ's bail was revoked. Following the period of revocation, a judge in the district court further reduced the bail to \$5,000. In the 5/9/19, findings setting the bail at \$5,000, the Judge noted that MENDEZ has a 15 page record, an open case for "A D/W – pit bull + ABDW (door)," "3 open cases w/ 'serious' charges", and a prior 2 to 3 year prison term for assaultive behavior.

saying? Who was in jail. And I'm like your brother is snitching, you know what I'm saying? Talk to him. Boom. He wrote me an affidavit, and shit, you know what I'm saying? He wrote me an affidavit saying that it, it wasn't us and shit, and he, he don't know the guys that did it. He knows me and shit. So we good, my nigga.

REYES-SMITH: Alright.

MENDEZ: *We gonna be good, my nigga. Trust me on that.*

REYES-SMITH: Yo, ah, I'm going to finish getting my money together for the lawyer, my nigga.

MENDEZ: Do you have, do you have that woman's number?

REYES-SMITH: Nah.

MENDEZ: I'm going give you, um, I'm going to give you my girl's number, write it, write it down real quick. Hit this (UI).

REYES-SMITH: Why don't you just send it to me?

MENDEZ: Alright, I'm going to send it to you. I'm going to send a text to you.

REYES-SMITH: Alright.

MENDEZ: Alright. ADR, bro.

REYES-SMITH: Nigga, tell everybody I love them, (UI).

MENDEZ: [talking to others] Yo, he said ADR to all you out there.

307. On February 24, 2019, MENDEZ was back in custody after being arrested on a new drug case, which has since been federally indicted (United States v. Mendez, 19-CR-10178-GAO). MENDEZ was intercepted on a consensual Title III on CW-9's phone discussing the case, and referencing the fact that his trial for the May 2018 incident was then-scheduled for the next day.²⁷ During this conversation, MENDEZ discusses the fact that his intimidation of the

²⁷ The court papers reflect a prior trial date was scheduled for February 25, 2019.

witnesses should work, and that MENDEZ knows the victims are not expected to come to court.

The following is a draft transcript of a portion of the conversation:

MENDEZ: Yeah, everything is good. I'm over here with the old man. I'm over here with Bubba. Bullshitting. You know what I'm saying? We over here and shit.

CW-9: That's what's up man. Everything good in there?

MENDEZ: I got trial, I got trial tomorrow.

CW-9: You got trial? Yeah, I heard.

MENDEZ: *Yeah so hopefully you know what I'm saying. If it goes my way it should get dismissed. There's no victim showing up, there's nobody showing up so. I don't know. You know what I mean?*

CW-9: Yeah.

MENDEZ: They're gonna try to continue it cuz I'm representing myself right. And the DA has two weeks, the DA has two weeks prior to my trial to give me my discovery.

CW-9: Yeah.

MENDEZ: My trial is tomorrow I still haven't gotten no discovery so.

CW-9: (OV) that's a violation they gotta release you. That's what happened to me.

MENDEZ: Yeah, they gotta they he's gonna try to get it, he's he's he wants me to make a big deal out of it so I can get a continuance right?

CW-9: Yeah.

MENDEZ: But that's not gonna happen. I'm ready with the trial my nigga. You know what I'm saying. They could give me my paperwork as we go. How's that.

III. 2019 Conspiracy to Murder and Rob Gangster Disciples

308. Over the past twelve months the rivalry between the LATIN KINGS in New

Bedford and the local Gangster Disciples gang²⁸ in New Bedford has intensified. Multiple shootings have been tied to this rivalry, culminating in the October 2019 murder of a 17 year old probationary member of the LATIN KINGS, who I will refer to as P.C. who was killed while in LATIN KINGS territory, near one of the trap houses. This murder has resulted in further incidents of violence between the New Bedford Chapter and the Gangster Disciples.

a. February 10, 2019, Armed Assault with Intent to Murder Rival Gang Members (PARIS, Jose VASQUEZ, JORGE)

309. A 2/10/19 recording captures CW-9, JORGE, PARIS and Jose VASQUEZ in 358 North Front Street discussing a recent shooting of rival gang members who had run into an LATIN KINGS trap house. JORGE states he saw messages on the chat about Gangster Disciples entering the trap house with guns, and JORGE states he spoke with N. VELAZQUEZ. JORGE states he was with “Trio” (TM, a/k/a King Trio), and “Blaze” (BM, a/k/a King Blaze). JORGE states that BM left, then ran back in, and started hearing shooting outside, which ended up being LATIN KINGS members.

310. JORGE states that Jose VASQUEZ and another person were going to get guns and he was waiting for them. JORGE described the problem was because a girl, whose boyfriend is a rival gang member, was now romantically involved with an LATIN KINGS member. JORGE and PARIS surmise that this woman provided info to the rival gang members. Jose VASQUEZ then states that the rivals entered the trap house with masks on.

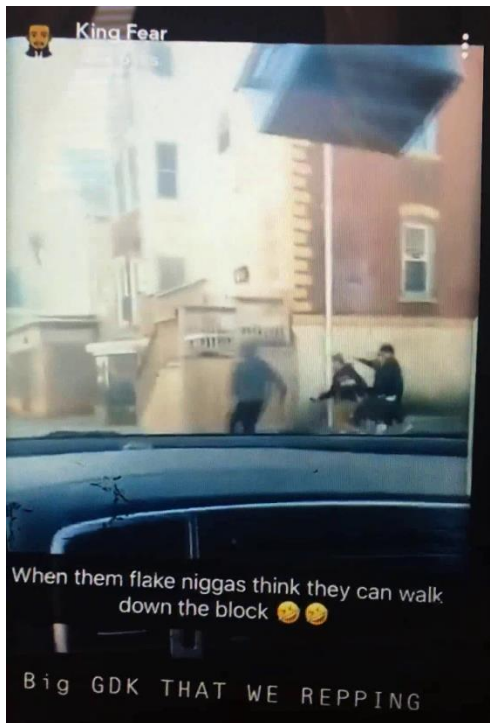
311. PARIS explains that he did the shooting, and shot at the rival gang members.

²⁸ During the course of the investigation members of the LATIN KINGS refer to the various south end gangs as Gangster Disciples or GDs. I know from prior cases that the gangs based in the south of New Bedford, including the Gangster Disciples and Crips have been referred to collectively as United Front.

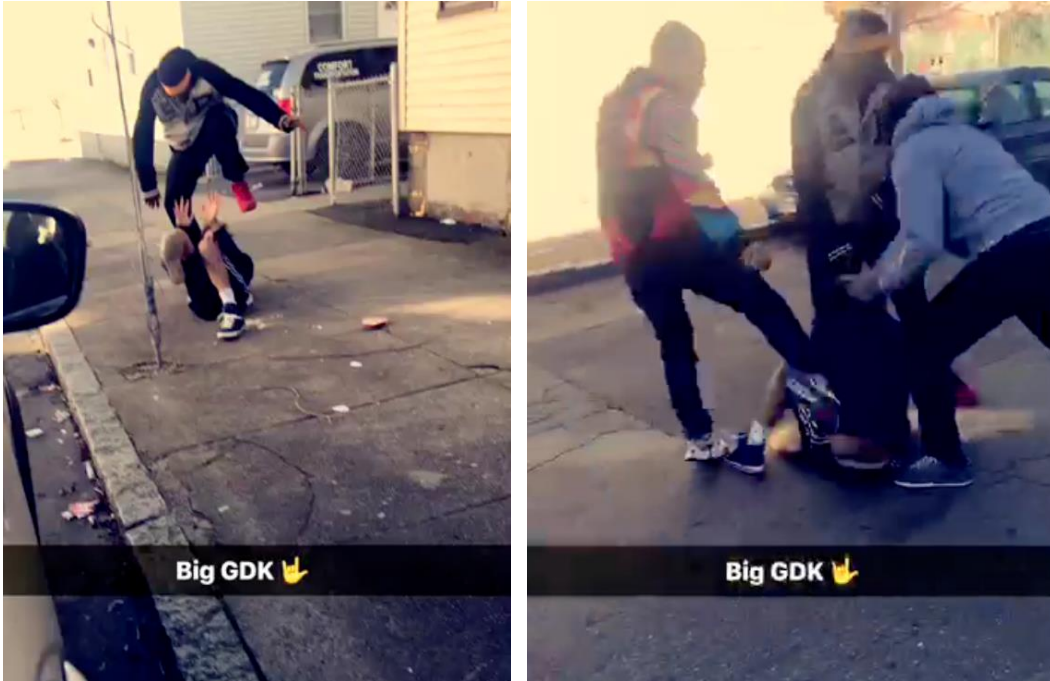
PARIS states that he acquired a firearm and went over to the trap house, fired, and that the gun jammed on him, and then he ran. PARIS indicated he shot at the rivals, and shattered glass on a vehicle. JORGE then can be heard discussing that he heard eight shots being fired. Jose VASQUEZ states the rivals “started a war” because they ran up in the trap with guns.

b. February 2019, Beatings of Gangster Disciple Members

312. In February 2019, CW-9 provided two social media videos received from other LATIN KINGS members that had been posted on the internet. In the first video, sent to CW-9 by Jose VASQUEZ, LATIN KINGS members, including Jose VASQUEZ can be observed exiting a car and immediately throwing an unidentified victim to the ground, then punching and kicking him. The victim can be heard stating, “I’m not GD, I’m not GD.” The banners on the videos read: “When them flake niggas think they can walk down the block” and “Big GDK that we repping.” Investigators know GDK means Gangster Disciple Killer, and Flake to be a derogatory term for the Gangster Disciples. Still images from the video follow:



313. In another video, the same sequence occurs with multiple LATIN KINGS members, including SANTIAGO-TORRES, and JC, chasing, punching, and kicking an unidentified victim. At one point, one LATIN KINGS member sits on and straddles the victim's body as he lies in the street and throws a flurry punches at his face. The banner in the video has the words "Big GDK". Still images from the video follow:



c. February 23, 2019, Peace Negotiation

314. There was at least one attempt to negotiate a peace between the New Bedford Chapter and Gangster Disciples. This negotiation took place on 2/23/19, at the Mount Carmel Social Club in Springfield, MA. During this meeting members of the LATIN KINGS, including Jorge RODRIGUEZ, LIBERATO, PEGUERO-COLON, CALDERON, and CW-9 met with leaders of the Gangster Disciples in order to identify the cause of the rivalry, and address issues.

315. During this discussion Jorge RODRIGUEZ indicates that the LATIN KINGS and Gangster Disciples should not be fighting or shooting one another and that they can both make money selling drugs. Jorge RODRIGUEZ describes the situation on the ground in New Bedford

with respect to gang turf and that there is only one “set” of LATIN KINGS. The following is a draft transcript of a portion of the conversation:

CW-9: We got the whole north. You know what I’m saying? And we don’t mind anybody coming through with the common understanding with Franco like look we aint gonna flag in your hood, don’t flag in our hood. You get what I’m saying? Y’all can come through, do what y’all do, but you know what I’m saying don’t make no money out here, we don’t make no money in your hood. You get what I’m saying? And we don’t flag our, our, our colors in your hood, you don’t flag yours and we keep it mutual since we sit down with, with the vanguard because that’s what G had put in place.

RODRIGUEZ: Nah I was making, I was making money with him too, cause we, we said that when you come to our hood, you can work in our hood. We don’t give a fuck, just buy the work off us. You get what I’m saying? But, you know what I’m saying, in the long run, in the long run when we used to go to your hood and it was a problem of flagging and shit like that, so it became a problem in our hood then.

GD LEADER: Mhm.

RODRIGUEZ: If we cannot flag in your hood, don’t flag in our hood.

GD LEADER: Exactly.

RODRIGUEZ: So that, that was the whole issue. You know what I’m saying?

GD LEADER: Right, right.

GD LEADER: Showing respect.

RODRIGUEZ: Well like every, every GD who was in our hood and shit like that, we didn’t know, you want to be in the hood you can be in the hood, you can [UI], [UI]. You can move our work and shit, you got to move a book for my brother out here. Cause when we went to your hood, the same thing what you guys want, you guys want to move—you want us to move your work, right? So that’s the—so we always had that, that respect. You know what I’m saying, we’re with Franco, you know what I’m saying? But now Franco, he hit us up like the other day and said that’s oh the disrespect, I thought we had the [UI]. You know what I’m saying?

GD LEADER: Right.

RODRIGUEZ: You guys don't see it now but you got to correct your people then.

GD LEADER: Yeah.

RODRIGUEZ: Cause you, you know what I'm saying, how many Kings you got in New Bedford and every Kings in New Bedford report to one person in New Bedford, there's not a whole bunch of different sets. You get what I'm saying? So if you throwing a crown to one of us it's just basically you're doing it to me too.

GD LEADER: [UI]

RODRIGUEZ: You know what I'm saying? Because there's not a bunch of sets of Kings out there, there's only one set.

GD LEADER: Yeah.

316. Jorge RODRIGUEZ then implores the Gangster Disciple leaders that there need not be a war so long as the offending Gangster Disciple, identified by a street name of "Six," is properly punished and respect is reestablished between the gangs. Instead, Jorge RODRIGUEZ suggests that both gangs focus their efforts on identifying and killing snitches who threaten both gangs through potential prosecution. The following is a draft transcript of a portion of the conversation:

RODRIGUEZ: And shit like that you know what I'm saying bro, it's like I, it's like I said, we got so much beef out there, we got so much beef with each other for what? ***There's a whole bunch of snitches—if you want to be a good—there's a snitch out there! Go deal with the snitches out there! Go be—go kill them!*** Beefin' with each other is not making nothing, cause what we're doing is worrying—you never know who's doing this in this shit. One of us might flip over, one of you guys might flip over and [UI] snitching and shit. [UI] my opinion. That's my opinion. You, and I [UI] my brothers out there—

GD LEADER: [UI] out there, some of our people.

RODRIGUEZ: Well to be banging with each other for what? We should be helping each other put and then, and then, and then, with, with,

with, with each other and shit because right now, right now we banging with each other. Nigger no one of my people might snitch out, and then fuck everything up, go to the cops and everything, and then were all going down. One of your people might snitch out, and there's war going on and shit when we should be taking care of all the snitches out there. That's, that's what I'm telling brothers up there. You gon' fuck everybody else, we won't [UI] with snitches. If this nation we [UI] with them!

d. May 28, 2019, Armed Assault with Intent to Murder Rival Gang Member

317. On 5/28/19, at approximately 12:45 P.M., New Bedford Police were dispatched to 139 Dartmouth Street, for reports of shots fired. Through the investigation, officers learned that a group of LATIN KINGS had congregated to fight a rival gang, and that two gunshots were fired during the altercation. A nearby motor vehicle was struck by the gunfire. Witnesses provided descriptions of the suspects and two vehicles used by the suspects to flee the scene.

318. Witnesses further informed police that the altercation stemmed from a social media status update, which police later retrieved. In substance, the post included threats between Gangster Disciples members and LATIN KINGS members, including BM, and JC. Witnesses informed police that this incident started as a fist fight between the gang members, but shortly after the fight started someone yelled "gun" and everyone ran from the backyard, and shots were then fired.

319. According to the police report, surveillance video from nearby showed that one of the getaway vehicles was a white Chevrolet Silverado with tinted taillights that is consistent with the 2008 White Chevrolet Silverado, owned by Jorge RODRIGUEZ, VIN: 2GCEC19C181148562.

320. During the police response, a member of the Gangster Disciples, who I will refer to as Victim 6, attempted to enter the crime scene claiming that he wanted to help his friend.

Victim 6 would later be shot on September 30, 2019, in a further episode of this gang war.

321. Police obtained a video of the end of the altercation, where a person identified to be SANTIAGO can be observed running through the backyard with a black semi-automatic firearm in his hands. In total, the New Bedford Police were able to identify JC, SANTIAGO, SANTIAGO-TORRES, VARGAS, JOHNSON, and N. VELAZQUEZ as being present for the fight and gunfire.



322. CW-9 reported that he learned about this shooting from LATIN KINGS members, who stated that the shooting started with JC fighting with a member of the Gangster Disciples.

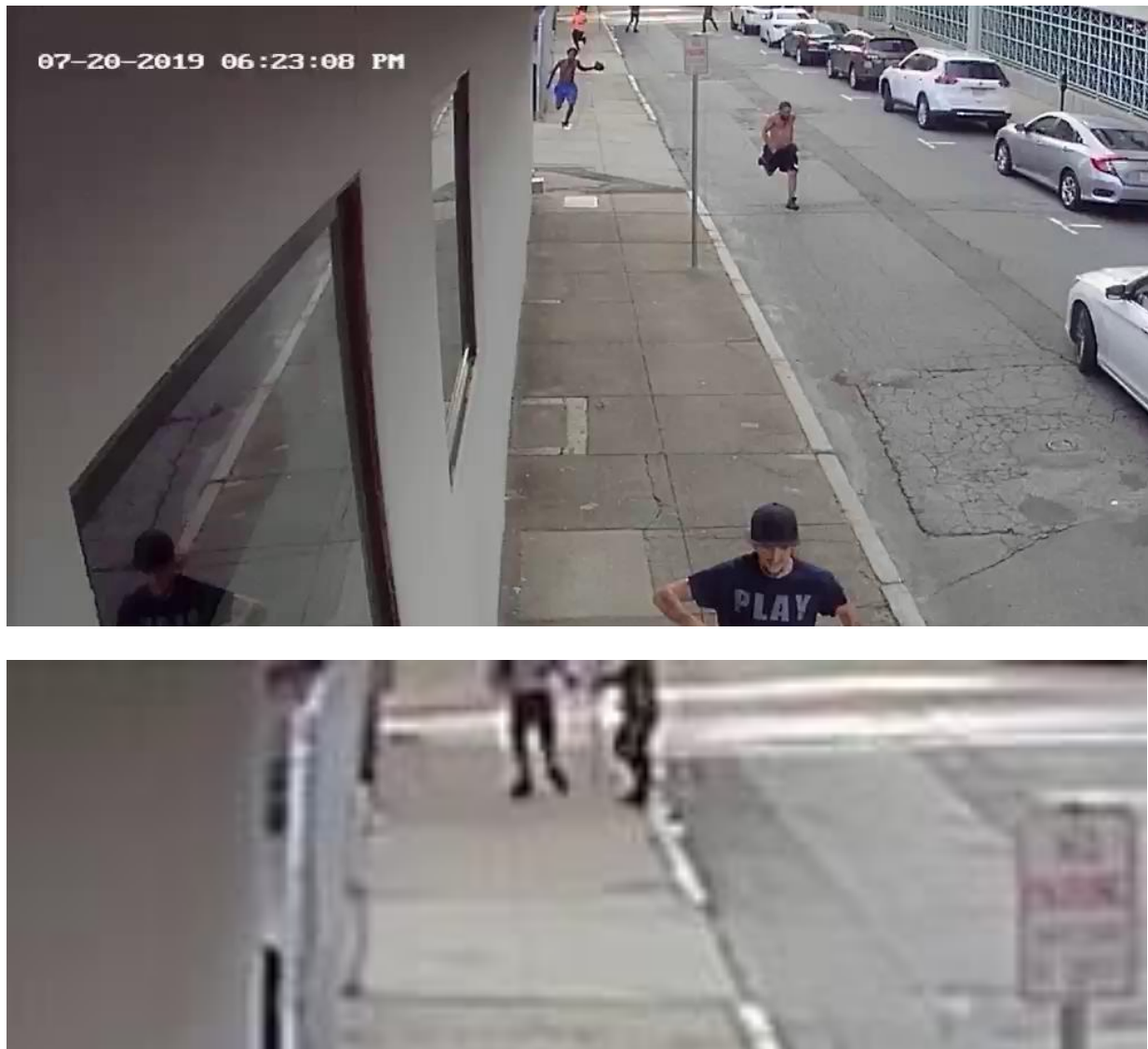
CW-9 reported that SANTIAGO-TORRES passed a firearm to SANTIAGO and that SANTIAGO fired two gunshots. CW-9 reported that the LATIN KINGS members fled the scene in a white pickup truck owned and operated by Jorge RODRIGUEZ.

e. July 20, 2019, Armed Assault with Intent to Murder Rival Gang Member

323. On 7/20/19, at approximately 7:13 P.M., New Bedford Police responded to the area of Purchase Street for the report of a fight involving 6 to 7 individuals. While en route, police were alerted that ShotSpotter had registered four gunshots being fired at the 636 Purchase Street location. When they arrived, witnesses told police that there had been a fight in the middle of the street involving several males, and shots were fired and the males had fled. Officers located a vehicle nearby that had been struck by gunfire. Ultimately six shell casings were located.

324. Officers reviewed cameras from nearby businesses and determined that at least eight individuals were involved in the fight. As the fight raged in the street, customers inside a bar turned their attention to the LATIN KINGS stomping and punching the rival gang members just outside.

325. Another surveillance video captured the shooting and depicts two individuals standing at the intersection of Purchase Street and School Street facing toward the fleeing rival gang members. One of the males can be seen at the very top of the frame, standing in the middle of the intersection in a stance consistent with firing rounds at the fleeing group. The shooter then hands the firearm to his accomplice. Both the shooter and the accomplice turn and leave the frame. Still images follow of the shooter discharging the firearm at the fleeing rival gang members, followed by a zoomed-in image of the firearm being transferred:



326. The video revealed that the shooter was wearing dark pants with visible white patterns consistent with ripped-styled jeans.

327. Officers were able to identify one of the victims of the shooting, Victim 7, and spoke to this individual. Victim 7 stated that he had walked to the liquor store and as he was walking back, approximately 5 males “came out of nowhere” and attacked them. Victim 7 stated that there was no argument prior to the fight and he had never seen the males before. Other persons also could not provide positive identification of the shooters or provide a motive.

328. At 7:33 P.M. that night, approximately fifteen minutes after the shooting, CW-9

recorded Jose VASQUEZ, T.M., B.M., and CW-9, discussing the shooting at 358 North Front Street, New Bedford, MA. The following is a draft transcript of a portion of the conversation:

CW-9: You got a hundred?

T.M.: No.

CW-9: You was over there too?

T.M.: (UI)

CW-9: Who started letting off?

(UI)

CW-9: Why'd he do that?

Jose VASQUEZ: I don't know why.

CW-9: He's the Cacique.²⁹ (UI)

Jose VASQUEZ: (UI)

CW-9: Them other niggas came busting through?

Jose VASQUEZ: (UI)

B.M.: (UI)

Jose VASQUEZ: I was like yo, yo, yo, yo (UI) Bam, Bam, Bam, Bam, I heard (UI) shots.

CW-9: Two shots? He let off like the whole clip.

B.M.: I heard bam, bam and then bam, bam, bam, bam, bam.

CW-9: The nigga (UI).

Jose VASQUEZ: (UI)

CW-9: The black nigga?

²⁹ CW-9 responds and identifies the shooter's rank as "Cacique." At the time, SNATIAGO-TORRES was the Cacique of the New Bedford Chapter.

VASQUEZ/B.M.: (Answer together) The black nigga.

CW-9: Nah Nah, The tall black nigga with braids. That we seen cause I passed by.

B.M.: That's the nigga I fought with.

CW-9: What?

B.M.: That's the nigga we jumped.

UNKNOWN: (UI)

CW-9: Yo Blaze.

B.M.: (UI)

CW-9: Talk to me... Y'all was just fighting the niggas (UI). Y'all was doing those niggas dirty. (UI)

Jose VASQUEZ: (UI) You know me (UI) when I pulled up. All I see (UI) take money from the bros. So that's something I (UI). What Landi had said was (UI) I don't know this location or nothing. He's telling me before anything, he's like yo, he's like when you get over here let me know. (UI) I'm thinking he has it already set up like its good. So when I pull up I see bros in the middle of the street chasing him, and then all like. So I see Jeo, that's when we get out of the whip. I see Jeo square up with the nigga and the nigga square up and I came around underneath and was like [noise] woooo, and I hit that nigga. That's when we started rocking everybody up.

B.M.: (UI) I was like, all right fuck it. (UI)

Jose VASQUEZ: Like I said, I knew we had him, banging on these niggas (UI) My niggas, (UI).

B.M.: (UI) off the rip. Alright I'm hip. Real talk. (UI) because we be getting money. (UI)

CW-9: (UI) How we do it (UI) I thought we had (UI) at the hill, then I saw (UI) and I see a bunch of bros popping (UI). They popping on the niggas

B.M.: Yea that's why like, we good we don't need that nigga.

CW-9: I was like mamita get it on snap, get it on snap.

Jose VASQUEZ: Did she get it (UI).

CW-9: Nahhhhh. She didn't (UI).

B.M.: Damnnnnn.

CW-9: (UI)

UNKNOWN: (unintelligible)

B.M.: I backed up. (UI) I'm like, I see the first (UI) (loud clapping noise) (UI) boom boom, boom boom boom boom boom boom boom.

Jose VASQUEZ: By the house (UI)

CW-9: He shot at the hill? Or he shot at the (UI).

B.M.: Bro, (UI)

CW-9: The one with the dread, with the dreads (UI).

Jose VASQUEZ: There was an asian nigga too. Light skinned, he looked white.

CW-9: Well that nigga with the dreads, (UI) front building.

Jose VASQUEZ: The white house, right?

CW-9: No, he ran into the building.

Jose VASQUEZ: (UI) There was a white house, that (UI) nigga.

B.M.: (UI)

Jose VASQUEZ: Now we are gunna have to (UI). Everybody out there (UI).

CW-9: (UI) in my car, and I was like oh shit. When I heard the pop pop, (UI) I was like wheeeppp. We was gone!

Jose VASQUEZ: When I moved over nigga, (UI) when I moved on him he just fell down to the floor, the bros just started kicking the

nigga. So I looked around, whoever (UI), then (UI), that's when I heard the shots.

B.M.: Shots, I look up (UI)

CW-9: Oh... I thought this nigga was shooting at y'all.

Jose VASQUEZ: I didn't know who was shooting. I know I heard a nine nigga, cause it sounded so familiar. So I was like, oh yah that's this nigga setting it off.

CW-9: Hey! (Yelling at dogs) They all (UI) now.

Jose VASQUEZ: (UI)

CW-9: (UI).

Jose VASQUEZ: I don't know (UI).

B.M.: Yea yea, I (UI).

Jose VASQUEZ: They GD niggas.

B.M.: It's alright though we get it popping you feel me.

329. Later that night at approximately 8:20 P.M., at 358 North Front Street, New Bedford, MA, CW-9 recorded SANTIAGO-TORRES and Jose VASQUEZ, discussing the shooting. During the recordings, SANTIAGO-TORRES identifies Jose VASQUEZ, GUADALUPE, J.C., and E.G. as being involved. Additionally, SANTIAGO-TORRES describes how he fired the shots, and CW-9 rebukes him for being the one to shoot since he holds the rank of Cacique. The following is a draft transcript of a portion of the conversation:

SANTIAGO-TORRES: Yo all I seen jogging [UI]. Yo I all we see is these Ops niggas running. Yo unlock the door, unlock the door! All I see is Jeo square up with a nigga I swerve boop [PH] and the nigga and you ended up coming around the corner come from around the corner like boop [PH] kick that nigga in the face.

Jose VASQUEZ: You saw me?

SANTIAGO-TORRES: [UI]

Jose VASQUEZ: You saw me?

SANTIAGO-TORRES: [UI] It was like bow [PH] I saw bro's car, I'm like. I was gonna hit that nigga right there. He was on the floor. I was like ooo he's hurt then I saw the car and he stopped perfect.

[unknown laughter]

(Audio distorted)

CW-9: Then ya'll bounced.

SANTIAGO-TORRES: Yo we stashed it, everything.

CW-9: The minute I heard pop pop pop! I said I'm out.

(Audio distorted)

CW-9: Them niggas is all Montes?³⁰

(Audio distorted)

Jose VASQUEZ: Who are those niggas?

SANTIAGO-TORRES: They are Montes.

[unknown [UI]]

UM: The nigga with the braids

CW-9: That was so gay.

SANTIAGO-TORRES: That's the nigga that [UI]

CW-9: Give me a cigarette Ma. [speaking in Spanish: "a cigarette"]. That was gay as shit. He was like Gorda's do. Yo, who, who was you blinking at? Which one cause they were all getting [OV]

SANTIAGO-TORRES: The one with the braids. [OV]

³⁰ Investigators know that CW-9 is referring to Monte Park, which is a location associated with the Gangster Disciples.

CW-9: The one with the tattoos?

SANTIAGO-TORRES: The big nigga with the braids. That's the nigga that started with Tego and [UI] bro.

UM: The Spanish nigga.

Jose VASQUEZ: So nigga when, nigga [UI]

CW-9: Yeah that nigga [UI] when we passed by the house. He was in the front telling everybody what was going on.

SANTIAGO-TORRES: As soon as I went around the corner I saw fucking he was, I started blowing him and he was like [laughing] on my mother he was like, like nigga what the fuck is that gonna do. Jeo said he was looking at me like this. Jeo said he was literally standing there watching me shoot. He was like. He said I was looking at Pepe, [UI] Pepe.

[Laughing]

CW-9: You looked around to see if there was no cameras?

SANTIAGO-TORRES: They are gonna hit me with that [UI]. By camera they could get me with carrying without a license and stuff.

Jose VASQUEZ: Yeah and discharge

SANTIAGO-TORRES: Discharge, and attempted ah [UI]

CW-9: Alright, at least you got a week or two before that happens.

Jose VASQUEZ: Nah. Hell no that one goes out tonight, that goes out tonight.

CW-9: Nah. [UI]

SANTIAGO-TORRES: Bro the day that happened with [UI]

UM: I think today.

Jose VASQUEZ: The next day they picked on him, this nigga Primo. Primo got picked up the next day.³¹

³¹ I believe this to be a reference to MENDEZ, a/k/a KING PRIMO, and the May 29, 2018 incident referenced above. Review of the court papers for that case indicates that

SANTIAGO-TORRES: With Xavi it was two days.³² I mean with [UI] and he's still, he's still, [UI] but he's good he [UI]. Just chillin like

CW-9: But nigga you, but nigga you the Cacique

SANTIAGO-TORRES: Naw, I know but, these niggas. Bro I run up to the van, I'm, I'm lookin at niggas. Niggas is all standing like this. I'm like, give me the fucking thing. Niggas was all looking at me like dummies bro I'm not gonna fucking wait for no bros I'm doing my own thing [UI].

CW-9: You think those Montes are gonna come back?

SANTIAGO-TORRES: No, not over here.

UM: This nigga [UI]

CW-9: You don't think they'd come over here?

SANTIAGO-TORRES: Not over here.

Jose VASQUEZ; I think they know, they know we run the whole north.

UM: But we didn't, yo we didn't shoot right at no Montes.

SANTIAGO-TORRES: It wasn't at Montes it was at that nigga.

Jose VASQUEZ: [UI] block.

CW-9: You were two? Nah you was a block from Montes.

330. Then SANTIAGO-TORRES indicates that after he fired the shots, while he was running from the scene, a witness asked him if there was a shootout. The following is a draft transcript of a portion of the conversation:

SANTIAGO-TORRES: We were a block away from there. Yeah.

MENDEZ was arraigned on the charges May 31, 2018 (Docket No. 1833CR002828).

³² I believe this to be a reference to XQ, a/k/a King Xavi, and the May 29, 2018 incident referenced above. Review of the court papers for that case indicates that XQ was arraigned on the charges on May 31, 2018 (Docket No. 1833CR002829).

Jose VASQUEZ: No, you were a block from the police station.

SANTIAGO-TORRES: I was running, I was running and I stopped and started walking, and some guy was like, was there a shootout over there? I was like, I don't even know. I was just fucking jogging. Jeans and all. Like, you gonna ask my sweaty ass nigga if there's a shootout. Stupid.

Jose VASQUEZ: [Laughing]

SANTIAGO-TORRES: Worrying about sweating jogging with jeans nigga, I'm working out.

CW-9: Mamita said it, the only one with a coat on. You with a jacket on in 90 degree weather.

[Laughing]

CW-9: [Spanish: Right Mamita? Who had the only coat on?]

UM: Huh?

CW-9: [Spanish: Who had the coat on, the only coat on?]

SANTIAGO-TORRES: Yo, I run around the corner, right. I run around. I see this crib and I like, the thing is when I run I try to observe a lot. You know what I mean and see where I can go. You know what I mean.

CW-9: HEY!!

SANTIAGO-TORRES: I seen two fences, so I was like alright, that's where I'm gonna go, but there's a backyard so I see a little porch so I'm like I'ma just chill there and catch my breath. As soon as I round the corner Jeo was around the corner like this. He sitting under the balcony, like the porch like this. I was like yo what the fuck is you doing. He was like bro what are we doing. I said Bro. This nigga bro [UI]. He had me rolling like.

CW-9: I love Jeo man.

SANTIAGO-TORRES: He's with it. Yo Milly³³ [PH], Milly ran up, you saw him?

³³ Believed to be a reference GUADALUPE.

CW-9: He tackled one nigga.

SANTIAGO-TORRES: First in line, first in line I like that. I saw that.

CW-9: I was seeing all that shit and then I heard POP POP, I'm like [noise]. I was fucking trying to video it on snap so I could send it to G and couldn't even get that far. It happened too fast.

SANTIAGO-TORRES: Jeo and me was beating these niggas asses [laughter].

CW-9: That's why I don't know why you let off because there was no need for it. Ya'll niggas was already dumping these niggas out.

SANTIAGO-TORRES: Like I asked and shit and I was like damn, I don't want to look bad for you [UI]

CW-9: I didn't, I didn't say you should blow on them. I thought you meant fighting. Yeah, yeah, I'm gonna go an blow on this nigga. Okay.

SANTIAGO-TORRES: [UI] blow on these niggas

CW-9: And then when I heard boom boom boom [UI] [laughter]. Bro, hell no, in Springfield we say pop off on niggas. Nah, for what. If that was the case you should have popped on over there at the house.

SANTIAGO-TORRES: Nah cause they left. Then when they, they got there with the van that's when you told me meet by Family Dollar [PH] that's when we started walking that way.

CW-9: Cause I was driving to send that.

SANTIAGO-TORRES: And I went right down, boom, like this. Right on the hill where the bank was and they crossed the street [UI]

CW-9: Y'all niggas is wildin.

SANTIAGO-TORRES: I was like oh yeah, that's the whole clip.

CW-9: Y'all niggas is wildin. Y'all doing too much. You you you better find somewhere to hide. Fuck gotta go.

SANTIAGO-TORRES: I'm good, [UI] you know what time I'm on.

UM: I said the same thing and I got locked up, five minutes later.

331. During the recording, SANTIAGO-TORRES can be seen wearing jeans with a distinctive rip patterns consistent with that worn by the shooter in the surveillance video. A still image from the recording and a zoomed-in image from the surveillance video follow:



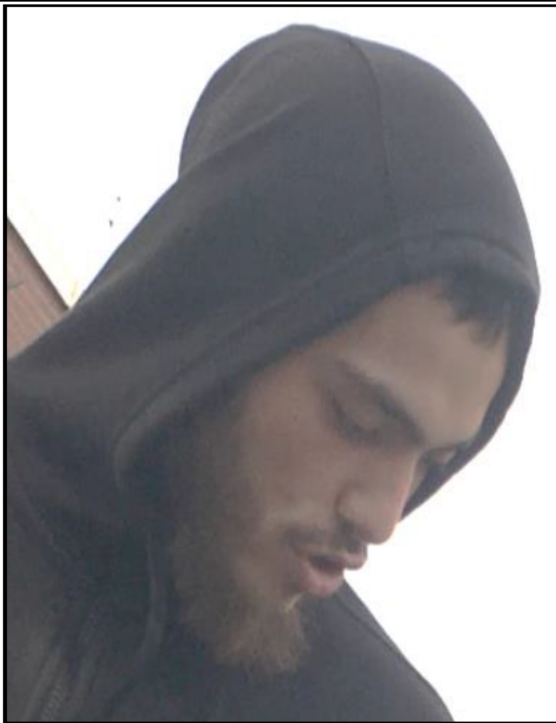
f. September 28, 2019, Armed Assault with Intent to Murder Rival Gang Member, Victim 8 (N. VELAZQUEZ, SANTIAGO-TORRES)

332. According to New Bedford Police reports, a shooting took place on 9/28/19 at 5:00 P.M., in the area of Purchase Street in New Bedford, MA (New Bedford Police #19-11373).

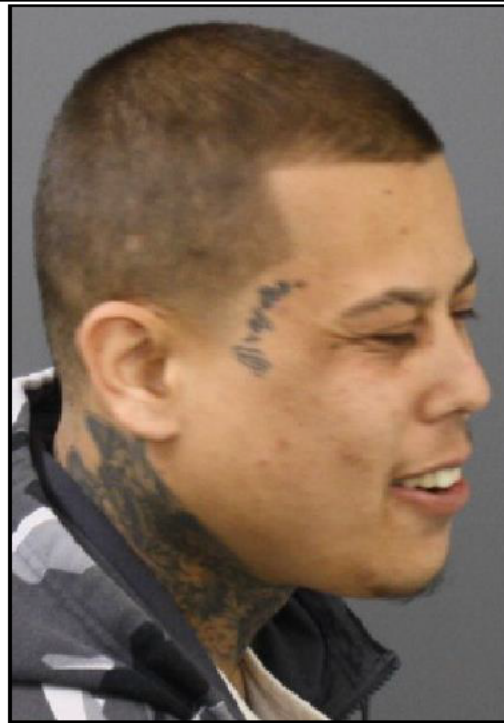
A caller reported three or four gunshots and that the shooter was wearing a navy blue sweatshirt and was seen shooting on Purchase Street. The caller reported that the victim of the shooting had gotten into a black Infiniti. I will refer to this victim as Victim 8. Victim 8 was later transported to Rhode Island Hospital and was determined to have gunshot wounds to his arm and chest. Investigators believe that this incident was related to the ongoing war between the LATIN KINGS and rival gangs in New Bedford, including the Gangster Disciples.

333. Officers arrived and located shell casings from three different caliber weapons (9mm, .40 caliber, and .380 caliber), took a further statement from a witness and canvassed the area for surveillance video. At least one vehicle and one residence appeared to have been struck by projectiles. A witness reported that one of the shooters was wearing a blue hooded sweatshirt and got into the rear of a Nissan Rogue after the shooting.

334. Officers reviewed New Bedford City cameras to develop further evidence of the Nissan Rogue's involvement and retrieved significant video evidence. According to the officers' review of the surveillance video, 30 minutes before the shooting the Nissan Rogue travels up Sawyer Street and pulled into the parking lot across from 235/239 Sawyer Street. The Nissan Rogue eventually pulled onto Sawyer Street traveled east and turns around in a lot. The Nissan Rogue then parks in the area of 235 Sawyer Street. Later, a passenger side view into the Nissan Rogue was captured on video. A profile of the front passenger and a frontal view of the rear passenger side male was visible. Officers were able to identify the rear passenger side male as Natanael VELAZQUEZ, and the front passenger to be SANTIAGO-TORRES. Still images from the surveillance video, juxtaposed with images of N. VELAZQUEZ and SANTIAGO-TORRES follow:



NATANAEL VELAZQUEZ



ORLANDO SANTIAGO-TORRES

335. Officers then reviewed footage from the vicinity of the shooting, and observed two individuals exit the Nissan Rogue who appear to be wearing black colored hooded sweatshirts (front passenger and driver side rear passenger) and the third occupant wearing a blue

colored hooded sweatshirt exits from the passenger side rear of the vehicle. The group congregates until walking out of frame moments before the shooting. Based upon witness statements, and surveillance video N. VELAZQUEZ was charged with the shooting. According to the court papers, as of 11/16/19, N. VELAZQUEZ remains in warrant status on the case (Docket No. 1933CR005560).

g. September 30, 2019, Armed Robbery and Armed Assault with Intent to Murder Rival Gang Member Victim 6 (VARGAS, CARRASQUILLO, BARBOZA, LOPEZ-VELEZ)

336. According to New Bedford Police reports, a shooting took place on 9/30/19 at 133 Ruth Street, New Bedford, MA (New Bedford report #19-11451). A rival gang member of the LATIN KINGS, who I will refer to as Victim 6, was shot and told police he had been robbed. Victim 6 was later transported to Rhode Island Hospital.

337. Through review of surveillance video, suspect vehicles were identified, including a 2013 white Dodge Avenger 2013, VIN: 1C3CDZAB2DN681409, Mass. Reg. 9VW767, which is registered to Bessie Rodriguez, the mother of Jorge RODRIGUZ, Jose RODRIGUEZ and VARGAS, and a 2019 Toyota Camry, determined to be a rental vehicle. New Bedford Police located the Dodge Avenger in the driveway of 239 Sawyer Street, New Bedford, MA. Review of the surveillance video led to the identification of VARGAS being involved in the shooting, along with a number of other individuals that have not yet been identified by New Bedford Police.

338. According to the police report, VARGAS can be observed in the surveillance video waving a yellow bandana associated with the LATIN KINGS in order to claim the turf and disrespect any other street gang in the area. Numerous accomplices of VARGAS then cross the street and enter into the building where the shooting took place, followed by VARGAS moments later. Gunfire is then reported, and shortly thereafter, numerous persons, including VARGAS

run from the building and get into the white Dodge Avenger, and black Toyota Camry and leave the scene. Of note, Victim 6, was identified to be at the scene of the 5/28/19, Dartmouth Street shooting described above.

339. CW-9 provided information concerning this shooting. According to CW-9, BARBOZA, CARRASQUILLO, and JD, a/k/a Juju travelled to this shooting in BARBOZA's rental vehicle. According to CW-9, VARGAS drove the White Avenger, and FNU LNU, a/k/a Breezy and Emanuel LOPEZ-VELEZ, a/k/a MANNY travelled with VARGAS in the Avenger. CW-9 stated that the dispute arose over insults posted by a Gangster Disciple on social media about LATIN KINGS, and that the Gangster Disciple stated he would be on Ruth Street. CW-9 stated that the LATIN KINGS members attempted to rob the Gangster Disciple of his cell phone. According to CW-9, as the Gangster Disciple attempted to run away, VARGAS yelled "get him" at which point LOPEZ-VELEZ shot the Gangster Disciple. After the shooting, the LATIN KINGS members returned to their vehicles and fled the area. The group reconvened at 358 North Front Street, New Bedford, MA, and Jose RODRIGUEZ later called a meeting for all involved at his residence at 239 Sawyer Street, New Bedford, MA.

340. VARGAS was charged with being an accessory before the fact to the shooting in New Bedford District Court and was detained.

341. A 10/17/19 recording captures CW-9 discussing the 9/30/19 shooting with Emanuel LOPEZ-VELEZ, a/k/a Manny, who is a probationary member of the LATIN KINGS. CW-9 tells Manny that VARGAS wants LOPEZ-VELEZ to come forward and turn himself in for the shooting in order to clear VARGAS' name. CW-9 states, "he passed the burner to you right?" LOPEZ-VELEZ, replies "Yes, he was the one who had it. When I was running he told me to go get him."

h. October 24, 2019, Meeting of New Bedford Chapter to Discuss War with Rival Gangs

342. On 10/24/19, a recording captured a meeting of the New Bedford Chapter of the LATIN KINGS meeting at 104 Tallman Street, 1st Floor Rear Apartment, New Bedford, MA. This apartment is the current residence of N. VELAZQUEZ within one of the LATIN KINGS New Bedford trap houses. This meeting took place approximately five days after the murder of a 17 year probationary member of the LATIN KINGS, who I will refer to as P.C. This murder took place a short distance from 104 Tallman Street, and according to CW-9, the Gangster Disciples were responsible for the murder. The individuals that were present during the meeting included: Jorge RODRIGUEZ, Jose RODRIGUEZ, FELIX-RIVERA, LUGO, JORGE, JOHNSON, SANTIAGO-TORRES, RUIZ, CARRASQUILLO, GUADALUPE, N. VELAZQUEZ, MEDINA, COTTO, L.R., a/k/a Kiko, and LOPEZ-VELEZ.

343. At the beginning of the meeting, phones are instructed to be turned off and are collected from all those in attendance by FELIX-RIVERA. LUGO collects dues from the members for the fundo, and marks on a ledger all of those who paid and what amount was paid. The individual members report their contributions to LUGO who records the entries. During the collection of the money, Jorge RODRIGUEZ indicates he is paying \$400 now and \$600 later.

344. During the recording, MEDINA and JORGE can be heard discussing the North Front Lions (NFL) chat used by members of the New Bedford Chapter to coordinate their activity. They admonish the members to stop using the chat to send addresses of the opposing gang members.

345. Jorge RODRIGUEZ then begins to discuss the NFL chat stating, "That Facebook messenger is not to put nothing crazy, that's only if you got that beef, you know what I'm saying? Beefing can go real quick. Don't put no addresses, don't put the ops over here, and don't do

nothing. Be careful, there are outsiders around. Don't put nothing crazy in the messages because it's going to come back to everybody in that group and we are all going to get picked up in Rico, and all that crazy shit. We don't want, we don't want to do that, because it's Organized Crime, understand!"

346. Jorge RODRIGUEZ continues: "you guys need to remember when you guys discuss something about, something about guns, all that bullshit, about murders all that green shit, you gonna see a whole bunch of badges, you gonna see a whole bunch of pages and shit stop talking about that shit on your phone, put your phone away and talk to a brother one on one. That's why I say shut your phone off, put your phone away, you know?"

347. After this, Jose RODRIGUEZ can heard stating: "I'm not going to mention no bros, if it happens again I'm a put you out there. Stop calling me, and telling me yo the ops is there, what I'm gonna to do. Do what you need to do that's it. Don't call me (UI) what to do. Don't call me, I'm hanging up. Stop calling me and move on them, that's it. Stop calling me, just do it that's it."

i. November 12, 2019, Assault on Rival Gang Members (SANTIAGO-TORRES, LOPEZ-VELEZ, LR, a/k/a Kiko)

348. According to New Bedford Police report #19-13325, on 11/12/18, officers responded to a call of a fight taking place on County Street. Officers made contact with the victim who I will refer to as Victim 26. Victim 26 was being treated by paramedics and was observed to have minor injuries, including bumps on his head and face and a small cut on his forehead. Victim 26 refused to provide any information about the persons who had inflicted the injuries. Officers located a video of the incident from the County General Convenience store. I have reviewed that video. This video vividly depicts a brazen and brutal assault of Victim 26.

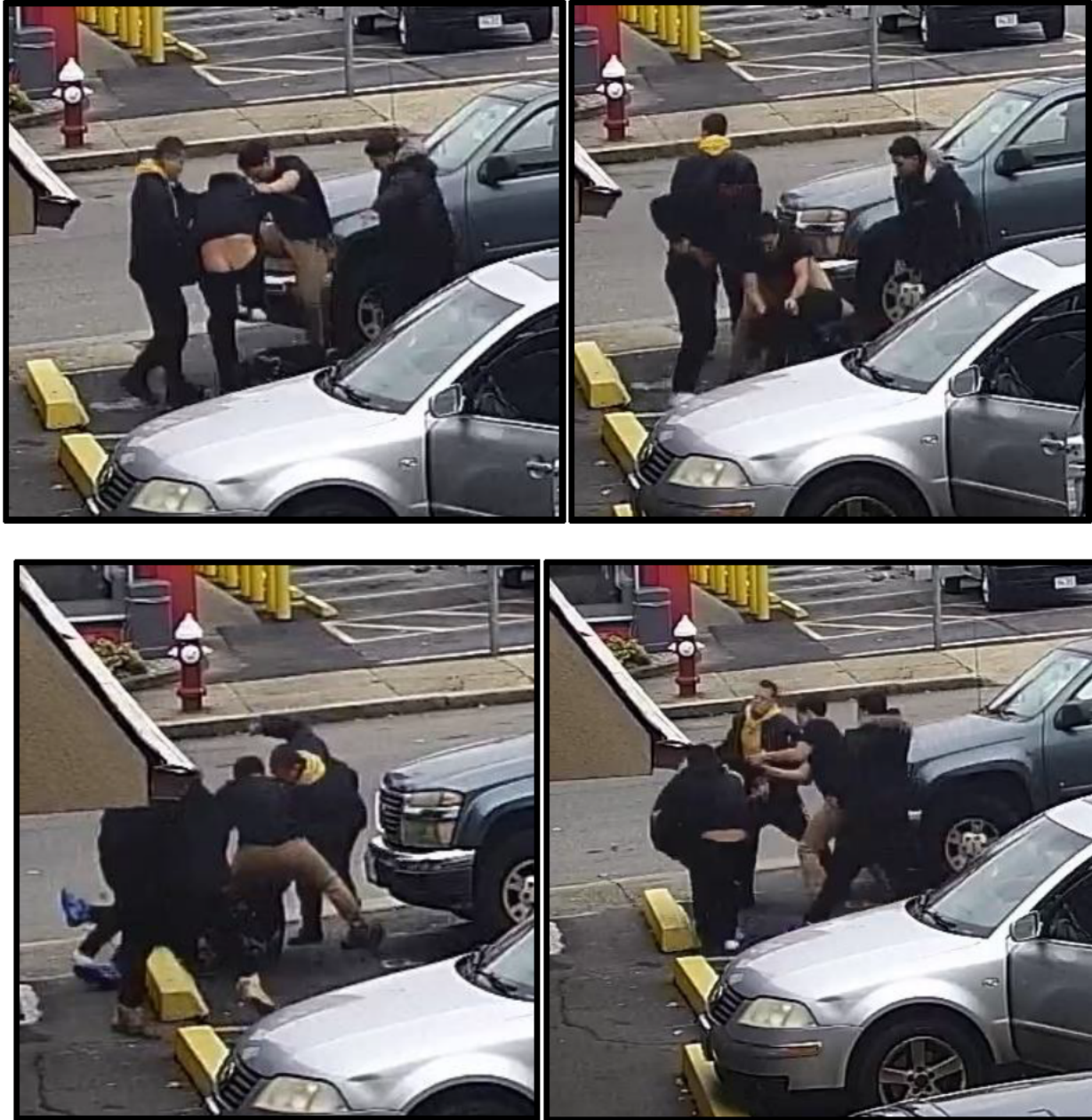
349. That video depicts SANTIAGO-TORRES, LOPEZ-VELEZ, LR, a/k/a Kiko, and another unidentified male enter the store, make purchases, and then exit the store at approximately 9:16 AM. As the group exited, they passed by a camera which captured their faces, and clothing. Still images of the group exiting follow:



350. As the group exits, their attention is drawn to a silver vehicle that is parked in front of the store. SANTIAGO-TORRES and LOPEZ-VELEZ peer into the vehicle to identify who is inside of the vehicle, and appear to exchange words with the occupants. A still image of this moment follows:



351. The group then circles around the vehicle and begins to pull on the door handle and strike the rear driver's side window of the silver vehicle. The front passenger then exits and runs away off camera to the left. The group circles around to the rear passenger side and drags Victim 26 from the vehicle and throws him to the pavement. Once on the ground, all four members of the group begin kicking and stomping on Victim 26, and throwing punches at his body. Victim 26 struggles to defend himself from the attack. A series of still images depicting SANTIAGO-TORRES, LOPEZ-VELEZ, LR, and the unidentified individual assaulting Victim 26 follows:



352. The LATIN KINGS members then dispersed and were later observed by police as they left the area. Shortly thereafter, SANTIAGO-TORRES posted a music video on YouTube where SANTIAGO-TORRES, LOPEZ-VELEZ, and LR rap about the ongoing gang war, and state threatening lyrics, and identify Victim 26 by his initials as “a bitch.” This music video is discussed in greater detail later in this document.

j. November 19, 2019, LOPEZ-VELEZ and SANTIAGO-TORRES

353. On 11/19/19, according to New Bedford Police field interview report #19-542, officers came into contact with LOPEZ-VELEZ and SANTIAGO-TORRES in the vicinity of 235 Sawyer Street, New Bedford, MA. LOPEZ-VELEZ addressed the officers and “appeared happy to see us and asked if we have been ‘running up his numbers.’” The New Bedford officers believed this to be a reference to LOPEZ-VELEZ’s music video on YouTube that was recently posted, specifically the song WAR TIME posted by SANTIAGO-TORRES.

k. November 2019, Assault and Robbery of Unknown Gangster Disciple

354. On 11/20/19, CW-9 forwarded a video of New Bedford Chapter LATIN KINGS members assaulting and robbing a rival gang member in the middle of the street, during broad daylight. The rival gang member is attacked and thrown to the ground, while more than five LATIN KINGS surround his body kicking, stomping and punching the victim while he struggles to defend himself in the middle of the street. Traffic is forced to drive around the scene that unfolds. At the end of the video, the LATIN KINGS steal an item that appears to be a wallet or a phone from the victim’s pants pocket. During the assault, the LATIN KINGS members state “Big GDK,” meaning Gangster Disciple Killer, and refer to the victim as food.

355. Still images from the video follow:



IV. Manufacturing of Cocaine Base

356. A 5/30/19 recording captured Jorge RODRIGUEZ and Yuen Liu-Torres cooking crack at 358 North Front Street, Apartment 1S, New Bedford, MA. During the video, a scale,

cocaine, and baking soda, can be seen on the counter. Jorge RODRIGUEZ can be seen stirring the pot as part of the process. During this recording, Jorge RODRIGUEZ and YLT and CW-9 discuss cocaine supply, and prices for bricks of cocaine. A still image from this recording follows:



357. A 7/10/19 recording captured Jorge RODRIGUEZ cooking approximately 500 grams of cocaine base, with LUGO, JORGE, FELIX-RIVERA, and RUIZ, who are also present at 358 North Front Street, Apartment 1S, New Bedford, MA. During the video, Jorge RODRIGUEZ can be seen stirring the pot, and adding baking soda and ice cubes to the pot. Freshly cooked crack cocaine can be seen on the counter. Still images from this recording follow:





358. On 7/18/19, a recording captured MEDINA and VARGAS preparing to cook cocaine base at 238 Davis Street, Apartment 10, New Bedford, MA. MEDINA can be seen unpacking supplies, including a pot, baking powder and plastic baggies in the kitchen. MEDINA can also be seen filling the pot with water to cook the cocaine base. Additionally, VARGAS can be seen holding a kilogram of suspected cocaine, which was stamped “Gucci.” Still images from this recording follow:



359. A 7/31/19 recording captured Jorge RODRIGUEZ cooking approximately 500 grams of cocaine base at 358 North Front Street, Apartment 1S, New Bedford, MA. During the video, Jorge RODRIGUEZ can be seen stirring the pot. A scale, and plastic baggies, and an

amount of cocaine base are visible on top of the washer/dryer. Also present during this recording are LUGO, VARGAS, VEGA and Jose VASQUEZ. A still image from this recording follows:



360. An 8/2/19 recording captured Jorge RODRIGUEZ cooking approximately 500 grams of cocaine base at 238 Davis Street, Apartment 10, New Bedford, MA. CW-9 is seen retrieving the pot and filling it with water while Jorge RODRIGUEZ is on the phone. CW-9 retrieves a box from the top right side of the closet where CW-9 indicated the cocaine was hidden. Jorge RODRIGUEZ is seen at the stove placing a Pyrex measuring cup in the pot with water and then cooking it. Still images from this recording follow:



361. An 8/7/19 recording captured Jorge RODRIGUEZ cooking approximately one kilogram of cocaine base at 238 Davis Street, Apartment 10, New Bedford, MA. RUIZ is also present during the recording. During the recording, two firearms can be seen laying on top of a

pink towel, which Jorge RODRIGUEZ places in the closet. During the recording, visible on the mini-fridge, table, and window sill is a large amount of cocaine base drying out in individual piles. Additionally, located on the top of the mini-fridge was baking soda, a scale, and clear plastic baggies. Additional cocaine base is visible on the counter of the kitchen. Jorge RODRIGUEZ can be observed stirring the pot at the stove, and then separating cocaine base into individual piles to dry. Still images from this recording follow:





V. Distribution of Controlled Substances, Cocaine, Cocaine base, and Heroin

362. A 7/14/18 interception between BARBOZA and Jorge RODRIGUEZ captures BARBOZA informing Jorge RODRIGUEZ that she had 19 things in a bag, bagged up, and had “two, almost two and a half freaking UI balls.” BARBOZA tells Jorge RODRIGUEZ that half of everything, all the “work,” is gone and she does not have all the money to repay Jorge RODRIGUEZ (Session 319). BARBOZA believes she served a customer and left the door open before she left, and got robbed of the “work,” while she was out. BARBOZA discusses payments she has to make to other LATIN KINGS members and for MENDEZ’s attorney. BARBOZA asks Jorge RODRIGUEZ to tell “X” (VALENTIN-SOTO) about the situation, and RODRIGUEZ tells BARBOZA to call him when BARBOZA is with X (VALENTIN-SOTO), Jorge RODRIGUEZ and BARBOZA discuss her working at a place where she is renting a room.

363. A 11/10/18 recording captures JORGE discussing distribution of crack cocaine, and particular sales of 8 balls, or 62 gram packages, and various prices. JORGE discusses a recent beating of an individual and buying drugs from Jose RODRIGUEZ, and specific

purchases of an 8-ball and 32 grams. JORGE engages in extensive conversation concerning negotiating prices for cocaine base.

364. A 2/4/19 recording captures FIGUEROA, VALENTIN-SOTO, MENDEZ, Jorge RODRIGUEZ and BARBOZA discussing narcotics dealing and a recent assault of Victim 24. During the recording VALENTIN-SOTO asks FIGUEROA, “you have work?” FIGUEROA responds, “in my ass.” Jorge RODRIGUEZ then instructs FIGUEROA to put the “work” in the car in order to protect high ranking LATIN KINGS members, who were then present. The group then discusses the assault of Victim 24, and compare it to the assault of FNU LNU, a/k/a Chimook. The group discusses how Chimook screamed more than Victim 24. During the discussion of the assault an UM stated, “when G said give him a minute and everybody a minute.” During the conversation, Jorge RODRIGUEZ states that FIGUEROA “ate” too, meaning that FIGUEROA took part in the assault. FIGUEROA also mentions that he tried hitting Victim 24 with a chair. Jorge RODRIGUEZ also mentions that he had a lot of LATIN KINGS involved in the beating of Victim 24. They also discuss various members being in bad standing.

365. On 2/7/19, a search warrant was executed at 239 Sawyer Street, Apartment 4N, New Bedford, MA. An officer asked MENDEZ for a combination to two safes that were in the apartment, one large and one small. MENDEZ could not provide the combinations, and stated: “I had the combination for [the larger] one, but not the small one. That’s Royalty’s.” Officers opened the small safe, and recovered 21 bags of marijuana weighing 602.7 grams, 57 bags of cocaine weighing 17.1 grams, a digital scale, and \$1,900 in US Currency. BARBOZA who was also present then stated: “Royalty got weed in there, but he’s got a marijuana card.” Following that search, MENDEZ was arrested by New Bedford Police at 239 Sawyer Street, Apt 4N, New

Bedford, MA. MENDEZ has since been federally indicted for this incident (United States v. Mendez, 19-CR-10178-GAO).

366. A 6/13/19 recording captures RUIZ distributing what CW-9 described as approximately 7 grams of crack cocaine to Juan FIGUEROA at 358 North Front Street, New Bedford, MA. FIGUEROA gives the cocaine base to E.G. CW-9 asks where FIGUEROA is going and FIGUEROA responds, “to get this money.”

367. A 7/13/19 recording captures Jose VASQUEZ giving CW-9 \$4,000, for cocaine base which Jorge RODRIGUEZ provided to LATIN KINGS members before he went out of town. This recording takes place at 239 Sawyer Street, New Bedford, MA.

368. A 7/18/19 recording at 358 North Front Street, New Bedford, MA, captures Jose VASQUEZ giving CW-9 \$1,250 on behalf of COTTO for cocaine base which Jorge RODRIGUEZ provided to LATIN KINGS members before he went out of town. During the recording, Jose VASQUEZ states the money was from COTTO, SANTIAGO-TORRES, and himself. CW-9 informs Jose VASQUEZ that he is waiting for Jose RODRIGUEZ to “chef up the work,” which means cook the crack, and tells Jose VASQUEZ that Jose RODRIGUEZ wants Jose VASQUEZ and SANTIAGO-TORRES to slow down the trap, which means to reduce the foot traffic in order to reduce the risk of law enforcement scrutiny. SANTIAGO-TORRES enters and tells CW-9 that the trap is busy because other brothers like CALDERON and CARRASQUILLO come there to trap, meaning sell drugs. SANTIAGO-TORRES states, “I have seen Stutter cook a whole brick in one pop,” referring to Jose RODRIGUEZ.

369. A 7/18/19 recording at 358 North Front Street, Apartment 1S, New Bedford, MA, captures CARRASQUILLO providing \$700 to CW-9 for cocaine base, which Jorge RODRIGUEZ previously provided to LATIN KINGS members before he went out of town.

Also depicted in the recording are GUADALUPE, and VARGAS.

370. A 7/18/19 recording captures COTTO giving CW-9 \$200 for cocaine base, which Jorge RODRIGUEZ provided to LATIN KINGS members before he went out of town. Jose RODRIGUEZ was present during the exchange.

371. A 7/19/19 recording at 358 North Front Street, New Bedford, MA, captures JORGE providing CW-9 with \$2,500, which was owed to Jorge RODRIGUEZ for cocaine base provided to LATIN KINGS members before he went out of town.

372. A 7/20/19 recording inside of CW-9's vehicle captures Jose VASQUEZ, SANTIAGO-TORRES, and CARRASQUILLO providing money CW-9 for cocaine base, which Jorge RODRIGUEZ provided to LATIN KINGS members while he was out of town. SANTIAGO-TORRES gave CW-9 \$900; Jose VASQUEZ gave CW-9 \$1,250; CARRASQUILLO gave CW-9 an unknown amount. Jose VASQUEZ, SANTIAGO-TORRES, and CARRASQUILLO can be observed entering CW-9's vehicle and passing the money to CW-9 one at a time.

MUSIC VIDEOS DEPICTING THE LATIN KINGS

373. Like many violent street gangs, the LATIN KINGS endeavors to project power over the internet through the creation, marketing and promotion of music videos featuring their members. These music videos contain depictions of the members holding and carry firearms, boasting about their proclivity for violence, and the scope of their successful drug distribution operations. In the music videos, the LATIN KINGS imagery and symbolism can be seen in full effect: the persons in the videos wear LATIN KINGS colors and clothing, paraphernalia associated with the LATIN KINGS is visible, and members throw up the crowns and other gang signs, along with weapons and other implements.

374. In particular, these music videos have been identified in the investigation for their use by LATIN KINGS as warnings and threats to other rival gangs. Additionally, the music videos contain entire groups of LATIN KINGS members associating and affiliating with each other while wearing and engaging in the symbolism of the LATIN KINGS enterprise. As such, the music videos serve to reflect the current standing and affiliation of the persons depicted within the LATIN KINGS enterprise. Furthermore, the lyrics reveal the current rivalries that the various LATIN KINGS street gangs in Boston and New Bedford are engaged in. Overall, given the numerous incidents of violence and drug distribution that have been recorded on video during the investigation, the music videos are best understood to be boastful admissions to the very racketeering activity for which the LATIN KINGS members are under investigation.

375. In March 2019, FIGUEROA posted a video titled “Exposing Me,” that was at one point viewable on YouTube. In this video numerous members of the LATIN KINGS, including SANTIAGO, CALDERON, SANTIAGO-TORRES, Jose RODRIGUEZ, Jose VASQUEZ, COTTO, GUADALUPE, N. VELAZQUEZ, and A. VELASQUEZ can be seen. At the start of the video, a burning red bandana can be seen, symbolizing disrespect to the Bloods, who are associated with red. COTTO can be observed in the video holding and brandishing a large AR-style rifle that he aims at the camera. FIGUEROA, CALDERON, and GUADALUPE can also be observed holding firearms as well.

376. The lyrics contain specific references and threats to opposing gangs, including the Bloods (“bounty hunters”), Dominican Don’t Play (“DDP”), and Trinitarios (“Trinis”): “Let me catch a Trini and I’m a leave em on a poster B”; “DDP I get them niggas flip like it was cool to me, Had them niggas dancing on the ground like they were Kooda B”³⁴; “Bounty hunters

³⁴ Kooda B is a well-known member of the Nine Trey Gangsta Bloods, which is a set of

flipping on they set, they were food to me, They big homey a rat that's facts and that ain't cool to see, Playing both sides, pussy boy like who you choose to be, Bounty hunter bitches don't let niggas go and fool you B." The lyrics also specifically identify persons in the rival gangs who have failed to retaliate for disrespect inflicted on them, and gangs whose members have "snitched" other members. Still images from the video follow:



Bloods located in New York, who were recently indicted in the Southern District of New York for racketeering offenses.

377. On 5/30/18, FIGUEROA posted a video to his YouTube channel titled “Purging” that can be viewed at: <https://www.youtube.com/watch?v=Ff8CSMbURWo>. In this video numerous members of the LATIN KINGS, including FIGUEROA, LUGO, COTTO, MENDEZ, SANTIAGO, SANTIAGO-TORRES, RUIZ, and others can be seen brandishing multiple firearms, a machete, a baseball bat, a hatchet, and other weapons. Throughout the video, the LATIN KINGS members can be seen throwing up gang signs, and other symbolic gestures, and wearing yellow and black, and a prop crown. Most ominously, the LATIN KINGS members carrying these weapons wear masks to conceal their identity from the viewer while conveying their willingness to commit violence. Still images from the video follow:



378. On 7/22/19, FIGUEROA posted a video to his YouTube channel titled “Welcome to the party rmx” that can be viewed at: <https://www.youtube.com/watch?v=Sp1qeevliTU>. In this video, numerous members of the New Bedford Chapter, including COTTO, SANTIAGO-TORRES, VARGAS, Jose VASQUEZ, and others can be seen dancing and generally addressing the camera. Throughout the video, FIGUEROA holds a firearm and points it at the camera, or alternatively displays a fan of dollar bills. Additionally, SANTIAGO-TORRES can be seen holding a firearm that he variously brandishes and points at the camera. Other LATIN KINGS

members throw up the crown and other gang symbols, and wear gang colors. During the video, FIGUEROA boasts of using and holding firearms, and of robbing rival gang members and shooting them. On 6/19/19, FIGUEROA was recorded by CW-9 discussing a recent shooting that he participated in, where he missed his target and his firearm jammed. On 7/20/19, two days before the video was posted, SANTIAGO-TORRES was captured on recording by CW-9 discussing a recent shooting of rival gang members that he participated in. Still images from the video follow:





379. On October 27, 2018, FIGUEROA posted a video to his YouTube channel titled “The Take Ova Pt 2,” that can be viewed at: <https://www.youtube.com/watch?v=6eY1X5L4jY8>. In the video FIGUEROA and COTTO can be observed in a kitchen where a female appears to be cooking cocaine base with baking soda, a small pot, and plastic baggies next to the stove. FIGUEROA sits on the counter, variously holding a firearm and displays a fan of cash to the camera. FIGUEROA boasts, “had to sit back for a little, had to chef up the cane,” which refers to his cooking of cocaine base. Still images from the video follow:



380. Another example involves the 10/19/19, murder of a 17 year old probationary New Bedford LATIN KINGS member who I will refer to as P.C. According to police reports, P.C. was shot and killed on the corner of Ashley Boulevard and Tallman Street, New Bedford, MA. This location is less than 200 feet from 104 Tallman Street, New Bedford, MA, which is a LATIN KINGS stronghold and trap house in New Bedford, MA. Investigators believe this murder took place as part of an escalating war between New Bedford LATIN KINGS members

and the Gangster Disciples. During the shooting, another LATIN KINGS member, JC, was also shot and suffered life-threatening injuries.

381. On 10/22/19, FIGUEROA posted a video to his YouTube channel titled “Drill Season,” that can be viewed at: <https://www.youtube.com/watch?v=LcdrWu2IY2o>. This video was filmed at the location where P.C. was murdered. In this video, FIGUEROA is surrounded by LATIN KINGS members, including JORGE, CARRASQUILLO, COTTO, GUADALUPE and SANTIAGO, who variously throw up LATIN KINGS gang signs, make pistol and trigger motions to the camera, and walk by the makeshift memorial of candles that have been left at the site of the murder. At the beginning of the video, the LATIN KINGS members chant: “Whose House? King’s House!” Later during the music video, FIGUEROA declares threats to the opposing gangs, generally pays homage to the memory of the slain LATIN KINGS member by pouring out liquor at the site of the murder, and sends the message of swift and forceful retaliation by the LATIN KINGS against those responsible for the murder. In particular the video contains threats directed to “flakes,” which are Gangster Disciples: “Third off fuck a flake nigga cuz them niggas really all bitch.” This video was created and produced within 72 hours of the actual murder and demonstrates the specific and particular messages that are being sent to the rival gangs and enemies of the LATIN KINGS through such music videos. Still images from the video follow:



382. On 11/13/19, SANTIAGO-TORRES posted a video to his YouTube channel titled “War Time,” that can be viewed at: <https://www.youtube.com/watch?v=wznuo88n2F8>. This video was filmed at the location where P.C. was murdered. Depictions of P.C. can be seen on clothing bearing his image, and his name is written on a cup. SANTIAGO-TORRES, CARRASQUILLO, GUADALUPE, COTTO and LOPEZ-VELEZ can be observed holding liquor bottles and bags of marijuana, throwing up gang signs and surrounding the camera. During the video, SANTIAGO-TORRES can be seen brandishing a firearm, which according to CW-9 is a real firearm. The video depicts North Front Street, and the trap house located at 358 North Front Street, New Bedford, MA. The lyrics consist of threats to opposing gang members, and boasts concerning the willingness of the LATIN KINGS to shoot the rival gang members. Three LATIN KINGS members rap on the song, including SANTIAGO-TORRES, LOPEZ-VELEZ, and L.R., a/k/a Kiko.

383. During the video, the rappers identify opposing gang members by name, and boast about using firearms and shooting rivals. The lyrics rapped by SANTIAGO-TORRES include the following: “Im a just shoot them, no acting nigga be capping; Hit em. Relax. Then back to the trap, where I get all the packs; Then back to the trap, where I get all the packs; Imma

just call up my brother and give him a visit, these niggas be bitches; Niggas be fucked with this, this AR aint missing.” The term “AR” is believed to be a reference to a rifle. SANTIAGO-TORRES, also states “Call up the Kings, hit em no joke; Riding the ghost to make you a ghost.”

384. During the video, SANTIAGO-TORRES addresses the 9/28/19 shooting of Victim 8 that he participated in with N. VELAZQUEZ. LR states, “slugs gonna merk him, bullets gon work him. Watch this nigga now he do the dance.” From the motion made during the “do the dance” lyric, it appears do the dance is a reference to the manner in which a body moves when shot. SANTIAGO-TORRES then states, “Watch how he do the dance, get hit like [first name of Victim 8], end up in CC.” During the song, SANTIAGO-TORRES specifically states the first name of Victim 8. I believe in these lyrics SANTIAGO-TORRES is boasting about the fact that he was involved in the 9/28/19 shooting of Victim 8, with N. VELAZQUEZ that targeted Victim 8. The term “CC” is believed to be a reference to Rhode Island Cooperative Care Center, the hospital where Victim 8 was treated after the shooting.

385. At another point in the video, L.R. states, “JO a bitch, and Jarrod a snitch, yo what the fuck type of shit is that.” SANTIAGO-TORRES then replies, “bro I don’t know, just pass me a pole, I’m a go run up the score.” I believe L.R. is referring to individual rival gang members by name, and SANTIAGO-TORRES responds by indicating that he is going to take a weapon and shoot rival gang members to “run up the score” in the ongoing gang war. Importantly, the initials of Victim 26 from the 11/12/19 incident described above are JO..

386. LOPEZ-VELEZ who also raps on the song states, “Gonna run up the score, Op talking like he wanted a smoke; Big lions, the whole gang gonna roar; Op 2, but we spitting for more.” I believe the lyrics “Op 2,” LOPEZ-VELEZ is referring to the fact that the LATIN KINGS have shot Victim 6 and Victim 8, and “spitting for more” means they are continuing to

target more members of the Gangster Disciples. LOPEZ-VELEZ then states, “I’m from a block where the niggas get clappin; And the witnesses don’t know what happened.” I know that “clappin” is slang for firing a gun. This lyric clearly is referring to the fact that LATIN KINGS members are engaging in shooting and violence, but do not face prosecution due to witnesses fearing retribution if they were to come forward.

387. Still images from the video follow:



**LATIN KINGS TRAP HOUSES IN NEW BEDFORD USED AS CENTERS OF
DRUG DISTRIBUTION AND VIOLENCE**

388. Based upon the nature of the LATIN KINGS enterprise in New Bedford, and the role of the landlord of certain properties in the enterprise, there is probable cause to believe that the LATIN KINGS enterprise has access and control over the entire premises of certain multi-unit apartment buildings in New Bedford. These identified apartment building are: 104 Tallman Street, New Bedford, MA; 358 North Front Street, New Bedford, MA; and 239 Sawyer Street, New Bedford. I will refer to 104 Tallman Street, New Bedford, MA; 358 North Front Street, New Bedford, MA; and 239 Sawyer Street, New Bedford, MA as the TRAP HOUSE LOCATIONS or TRAP HOUSES. Pictures of the three TRAP HOUSE LOCATIONS follow:

		
104 TALLMAN STREET	269 SAWYER STREET	358 NORTH FRONT STREET

389. The TRAP HOUSE LOCATIONS are owned by Robert AVITABILE, a/k/a “BOBBY,” an associate of the LATIN KINGS who communicates directly with LATIN KINGS leaders, Jorge RODRIGUEZ and Jose RODRIGUEZ to provide the TRAP HOUSE LOCATIONS for the benefit of the LATIN KINGS enterprise. As such, given recordings and

information provided by CW-9 relating to AVITABILE's involvement, I believe that AVITABILE is an associate of LATIN KINGS and a member of the racketeering conspiracy.

390. AVITABILE's ownership of the TRAP HOUSE LOCATIONS has been confirmed through reference to records available online from the Southern Bristol Registry of Deeds, and the New Bedford Assessor's Office that show AVITABILE to be the owner of 104 Tallman Street, New Bedford, MA, 239 Sawyer Street, New Bedford, MA, and 358 North Front Street, New Bedford, MA, either individually, or through trusts, where he is the trustee. According to the New Bedford Assessor's Office, AVITABILE owns 104 Tallman Street, through the AMA Realty Trust, for which AVITABILE is the Trustee and 40 Fortune Lane, Duxbury, MA, is listed as the owner address. According to the New Bedford Assessor's Office, AVITABILE owns 358 North Front Street individually, and 40 Fortune Lane, Duxbury, MA, is listed as the owner address. According to the New Bedford Assessor's Office, AVITABILE owns 239 Sawyer Street, through the 239 Sawyer Realty Trust, for which AVITABILE is the Trustee and 40 Fortune Lane, Duxbury, MA, is listed as the owner address. These entries at the New Bedford Assessor's Office, were confirmed by review of documents available online from the Southern Bristol County Registry of Deeds. As of 11/29/19, those records do not reflect any recent changes in ownership of the TRAP HOUSE LOCATIONS.

391. Additionally, I am familiar with a financial statement dated 3/8/16, signed by AVITABILE and provided to Bank Five (then known as Fall River Five Cent Savings) as part of a loan application, where AVITABILE states that he is the owner of the TRAP HOUSE LOCATIONS.

392. According to CW-9, AVITABILE has been present at 104 Tallman Street and 358 North Front Street when LATIN KINGS members were distributing cocaine base and knows of

the drug distribution activity being conducted by LATIN KINGS members in the apartment buildings that he owns. CW-9 estimated that AVITABILE was present at 358 North Front Street every other day in 2016, when CW-9 first started selling cocaine base in New Bedford. CW-9 estimated that AVITABILE has been present at 104 Tallman Street on approximately 25 occasions while CW-9 was present and LATIN KINGS members and associates were distributing controlled substances at the property.

393. Furthermore, according to CW-9, AVITABILE is entirely aware of the drug distribution and manufacturing activity that is taking place in the TRAP HOUSE LOCATIONS, and purposefully places tenants in his apartment buildings at the direction of the LATIN KINGS in order to facilitate the distribution of controlled substances by LATIN KINGS members.

394. According to CW-9, AVITABILE has mentioned complaints he has received from City Hall about the amount of foot traffic in the TRAP HOUSE LOCATIONS to LATIN KINGS members, but has not undertaken any meaningful efforts to reduce the drug distribution taking place and in fact profits from it through rent paid to him by the dealers. According to CW-9, AVITABILE evicted COTTO out of a second floor apartment in 104 Tallman Street, following a drug raid. However, AVITABILE in fact only conducted this eviction to foster the appearance of efforts to reduce drug activity in the building to city officials. According to CW-9, AVITABILE in fact moved COTTO to another apartment in 104 Tallman Street, and rented this unit to COTTO under COTTO's girlfriend's name.

395. CW-9 stated that AVITABILE has requested prostitutes from LATIN KINGS members. According to CW-9, AVITABILE in fact has been provided prostitutes by LATIN KINGS members. During a recording on 1/4/19, AVITABILE describes two prostitutes that he has lined up and notes that he is receiving pictures of the prostitutes. During a 2/4/19 recording,

AVITABILE asked Jorge RODRIGUEZ, “You getting me laid today or what?”

396. Also during the 1/4/19 recording, CW-9 tells AVITABILE that CW-9 will need some time to pay an outstanding rent owed to AVITABILE because CW-9 cannot hustle and due to a pending court case. AVITABILE tells CW-9 to “hustle this weekend,” meaning sell drugs, in order to get money needed to pay the outstanding rent owed. According to CW-9, AVITABILE has received cocaine from LATIN KINGS members as well.

397. I am familiar with New Bedford Police Report #19-2342, dated 3/1/19. In this report a tenant of 104 Tallman Street, who I will refer to as Victim 12, told police that AVITABILE had threatened her. Victim 12 stated that AVITABILE arrived at her apartment with Jorge RODRIGUEZ and was outside banging on her door. According to Victim 12, AVITABILE began yelling and stated “you better watch your back.” Victim 12 also stated that AVITABILE made threats that he is going to have the LATIN KINGS hurt them and remove them from the apartment. AVITABILE was charged in New Bedford District Court with threats, but the case was later dismissed on 6/18/19 (Docket No. 1933CR001799).

398. According to CW-9, AVITABILE owns and manages these properties and coordinates the specific tenants in each of the apartments of the TRAP HOUSE LOCATIONS with Jose RODRIGUEZ and Jorge RODRIGUEZ. According to CW-9, Jorge RODRIGUEZ determines which of the higher ranking members of the LATIN KINGS will occupy specific apartments in the TRAP HOUSE LOCATION to oversee the premises. Jorge RODRIGUEZ also determines the apartments that drug workers will occupy in order conduct street-level sales of narcotics as well.

399. The high ranking member of LATIN KINGS will receive large quantities of controlled substances from Jorge RODRIGUEZ and store them in the TRAP HOUSE apartment

that is under the enterprise's control. While the ranking member in each TRAP HOUSE runs the drug distribution in each premises, other apartments and common areas are utilized by so-called "workers" or lower-level associates and members of the LATIN KINGS to distribute controlled substances on the street-level to the drug customers. The workers usually occupy a different apartment accessible to drug customers. The high ranking member is obligated to pay Jorge RODRIGUEZ for the controlled substances, and individually pay AVITABILE for rent. Though the high ranking member pays AVITABILE directly, the LATIN KINGS through Jorge RODRIGUEZ controls the network of TRAP HOUSES throughout the northern part of New Bedford.

400. On 11/15/18, on a court-authorized interception, AVITABILE sent a text message to Jorge RODRIGUEZ: "I need the 600 for 358 n front. Plus 1800 he said he pay. I'll work out a deal talk him. Take some off cut him a deal. U guys come up all it once." I believe in this text message, AVITABILE is discussing outstanding rents owed by the LATIN KINGS members in AVITABILE's trap house. Demonstrating AVITABILE's knowledge of the structure of the LATIN KINGS, AVITABILE identifies outstanding rents owed by LATIN KINGS members and addresses those debts to Jorge RODRIGUEZ, a leader of the LATIN KINGS New Bedford Chapter.

401. The placement of LATIN KINGS members, worker and associates in certain apartments is designed to ensure that the LATIN KINGS can employ the TRAP HOUSES to their full potential as a retail distribution center for controlled substances. This arrangement conceals the activity from law enforcement and insulates leadership from investigation. Jorge RODRIGUEZ has been captured on recording advising LATIN KINGS members of how to conduct their activity at the premises in order to take advantage of the premises they control and

avoid detection and surveillance.

402. The high ranking member in each TRAP HOUSE ensures that the workers are constantly supplied with controlled substances. In order to do this, the high ranking member coordinates delivery with Jorge RODRIGUEZ to the TRAP HOUSE. The workers obtain the supply of drugs from the high ranking member and deliver cash proceeds from the drug sales. Additionally, the amounts of drugs provided to the workers are purposefully kept small in order to avoid enhanced penalties for larger quantities. In this way, the high ranking LATIN KINGS members and Jorge RODRIGUEZ themselves do not distribute controlled substances to the drug customers, who may not be known to the LATIN KINGS and may in fact be informants, working with law enforcement, or undercover officers. Additionally, this arrangement creates difficulty for law enforcement, who cannot readily generate suspicion as to the higher ranking members or their apartments.

403. Additionally, since the workers resupply of cocaine base originates from inside the same multi-unit apartment building, law enforcement are unable to conduct surveillance of the workers obtaining additional controlled substances. Moreover, in the event that law enforcement does obtain probable cause to search an apartment from which controlled substances are being distributed, these searches will be of premises that, by design, do not store large amounts of controlled substances, cash or currency, and where the leadership of the drug conspiracy will not be seen frequenting. The workers who are arrested and charged by law enforcement are essentially expendable pieces of the LATIN KINGS enterprise that the high-ranking members use to generate wealth for the enterprise, without exposing themselves to criminal prosecution. Furthermore, the nature of this coordinated drug conspiracy prevents law enforcement from ascertaining the source of the supply of controlled substances, or identifying

its leadership.

404. In the course of this investigation, it has also been determined that these TRAP HOUSES also serve as bases of operations for LATIN KINGS racketeering activity in addition to the distribution and manufacture of controlled substances. Numerous recordings have been made depicting LATIN KINGS members storing firearms in the TRAP HOUSES, returning to TRAP HOUSES after the commission of crimes of violence including armed assaults, robberies, shootings and fights involving rival gangs and those targeted for violence for the LATIN KINGS. The TRAP HOUSES also serve as locations where LATIN KINGS members meet and discuss enterprise business, discuss and assign roles and tasks to members, inflict systemized violence upon one another for transgressions, and generate promotional music videos.

405. This arrangement brings extensive benefits to the LATIN KINGS. Primarily, the TRAP HOUSES permit the LATIN KINGS to project power and influence, and direct violence throughout New Bedford. Access to the multiple apartment units in each of the TRAP HOUSE LOCATIONS provide safe houses for LATIN KINGS members to evade law enforcement. As particularized suspicion would likely not exist for each LATIN KINGS member in every apartment unit, the TRAP HOUSE LOCATIONS provide a means of directly thwarting law enforcement's investigation of the enterprise.

**LAUNDERING OF DRUG PROCEEDS AND ACQUISITION OF REAL ESTATE
THROUGH LATIN KINGS ASSOCIATE ROBERT AVITABILE**

406. This investigation has also developed evidence that the LATIN KINGS enterprise launders the proceeds of their drug distribution. In particular, a recent real estate transaction conducted by AVITABILE is believed to be a vehicle for Jorge RODRIGUEZ and Jose RODRIGUEZ to launder their drug proceeds through the renovation of a property recently purchased out of foreclosure.

407. On 11/15/18, on a court-authorized interception, AVITABILE sent a text message to Jorge RODRIGUEZ: “Need u come up 20k. Stud 20k. Me 20k. We rehab a place condo or house on ocean.” I believe in this text message, AVITABILE is discussing an investment property and states that Jorge RODRIGUEZ, Jose RODRIGUEZ (“Stud”) and he will jointly invest \$60,000 for a renovation project.

408. Through my training and experience I know that in a real estate investment laundering scenario, once the property is acquired, the illicit proceeds are introduced and laundered through cash payments to subcontractors hired to conduct the renovation project. Since each subcontractor would be paid directly for labor and materials, the source of the cash would not be questioned. Additionally, the subcontractor is not obliged to file currency transaction reports, and the payments would generally be in separate amounts, each under \$10,000 that would not raise suspicion. The drug money would then be invested in the renovation project, and ultimately recouped by the sale of the property to a third party, who would then pay a higher price after the renovation. This later sale yields a profit to the drug dealer that can then be declared as a lawful source of income.

409. In a 1/4/19 recording, AVITABILE discusses the details of such a real investment transaction and the manner by which they can conceal Jorge RODRIGUEZ’s involvement (and thereby his funds) from the bank.³⁵ Essentially, the recording captures Jorge RODRIGUEZ and AVITABILE discussing the manner by which they can invest Jorge RODRIGUEZ’s proceeds to purchase the house, and renovate it, without disclosing the source of the funds to the financing

³⁵ In this scenario, a “bank” would be involved in order to provide financing for the initial purchase of the property that would later be renovated through the investment of drug proceeds. The bank financing is necessary in this scenario to demonstrate a lawful source of the funds used to purchase the property by the buyers.

institution.

410. This necessity for concealment arises from the fact that on any loan application to purchase property that listed Jorge RODRIGUEZ as an applicant would cause the bank to inquire as to Jorge RODRIGUEZ's declared income and the source of any down payment. During the recording, AVITABILE describes to Jorge RODRIGUEZ how the transaction can be structured through a trust in order to conceal the illicit source of the funds that Jorge RODRIGUEZ would provide. Additionally, during the conversation AVITABILE indicates that he has an outstanding tax lien with the IRS that he needs to pay before engaging in this transaction. AVITABILE states that he can just take Jorge RODRIGUEZ's cash, claim it came from one of the buildings he owns, and use the cash to pay off the tax lien immediately. Once the lien is cleared, they can then engage in the real estate transaction. The following is a draft transcript of a portion of the conversation:

AVITABILE: So I'm two stories. So now I'm at my accountant's, and he's like guy you're fucked. I'm like, 'what are you talking about I'm fucked?' He said, 'cause you took the money from that house, he's like you need, you didn't fix it.' I'm like, 'so what if I didn't fix I'm like I paid the mortgage off, I paid Tallman Street off for two hundred grand.' He's like 'you're gonna get fucking taxed on it.' I'm like, 'what are you talking about,' he's like 'that's a two hundred thousand dollar gain.' And I'm like, 'how the fuck do you figure?' So I'm arguing with him, well I'm not arguing, but he's going back and forth with doing that and the [UI] shop—

RODRIGUEZ: Who, who said—?

AVITABILE: My accountant. So he's like what I would do if I was you, he's like I can probably try to delay it which I got to figure out which I got to talk to Ronny. And, and, so this would be what we feel. This is what we need to do. This is Jorge's money. So hold on. So, so hold on, so he goes, this is what he said, he's like I would fucking try to rebuild the—

RODRIGUEZ: Rebuild so—

AVITABILE: He's like I would try to rebuild it.

RODRIGUEZ: [UI]

AVITABILE: he said cause you're gonna get fucked

RODRIGUEZ: Right so that's where I come in.

411. Later during the 1/4/19, recording, AVITABILE and Jorge RODRIGUEZ discuss fixing up the premises with Jorge RODRIGUEZ's money, but that an outstanding issue with sprinklers in the building will prevent the permits from issuing for the work that Jorge RODRIGUEZ will be funding. AVITABILE discusses the price of \$20,000 for the sprinkler system and AVITABILE then describes how he can form a trust with Jorge RODRIGUEZ in order to not pay the government \$40,000 in taxes and complete the sprinkler system without incurring a taxable event when he receives the funds. The following is a draft transcript of a portion of the conversation:

RODRIGUEZ: No wait, wait, wait but we still got to build the whole house, everything, and then they got to come up with the, the, the tax with the sprinklers. They can't [UI] the sprinklers with the [UI]—

AVITABILE: So I can take your fifteen grand and go back to my accountant and say well how much am I gonna owe. Do you get it? Or, if it's, if it's fifteen thousand—

RODRIGUEZ: You not gonna, you not gonna get fucked. I'm gonna help you out, we help each other out.

AVITABILE: Right.

RODRIGUEZ: And then [UI] if I get my contract with you guys in there real quick and shit and if you—

AVITABILE: But I think if you—

CW-9: Fucking deal with the white man and you get with the man—

AVITABILE: Oh stop.

RODRIGUEZ: We gon', we gon', we gon' make, we gon' make, we gon' make a little on everything, and then we, and then we can get, I'll, I'll help you with whatever so you don't get fucked with the taxes.

AVITABILE: No I know, I know.

RODRIGUEZ: Oh I give you some of the money—

AVITABILE: I know, I know, I know—

RODRIGUEZ: And then that—

AVITABILE: Or we could do it in a trust.

RODRIGUEZ: So, so, so, yeah we could do something there, and then, then, then—

AVITABILE: Because I'm not paying the government fucking forty grand.

RODRIGUEZ: Yeah because—

AVITABILE: Fuck, I don't have forty grand.

CW-9: That's thirty percent though.

AVITABILE: Yeah but that's what will probably be two hundred times twenty percent gain, forty grand, he could probably get it to thirty, twenty.

CW-9: How, how? How?

RODRIGUEZ: Yo he got, he got, he got—

CW-9: [UI] you gonna pay like [UI]

AVITABILE: I don't know—

CW: [UI]

RODRIGUEZ: [UI]

AVITABILE: I don't know what it will be. I don't know what it will be yet.

RODRIGUEZ: Yo I'm gonna [UI]—

CW: [UI]

AVITABILE: I'm gonna see it this week—

RODRIGUEZ: Bobby, I'll help, I'll help, I'll help you out—

AVITABILE: Listen, I agree, I want the thing gone!

RODRIGUEZ: I want to, yo, I want to, yo but have I ever let you down, Bobby?

AVITABILE: No—

412. Then during the 1/4/19 recording, AVITABILE expresses that they need to invest \$20,000 immediately to remedy the sprinkler system prior to any transaction so as to save Jorge RODRIGUEZ from having to fix it later. Jorge RODRIGUEZ replies, referring to the \$20,000 price, "I make that in one day." The following is a draft transcript of a portion of the conversation:

AVITABILE: No, I know. But I'm just trying to get around the sprinkler for you.

RODRIGUEZ: I understand that, no but its—

AVITABILE: Because it's twenty thousand dollars!

RODRIGUEZ: ***I make that in one day.***

AVITABILE: Hold on. That's twenty grand for a sprinkler.

RODRIGUEZ: Who cares? What the fuck?

413. Then during the 1/4/19, recording Jorge RODRIGUEZ and AVITABILE discuss the involvement of a third party, and that the third party has already invested some money into the rehabilitation of the property. AVITABILE informs Jorge RODRIGUEZ that the third party may not be happy with having lost the initial money that was invested. Jorge RODRIGUEZ tells AVITABILE that he will "fucking shoot" the third party in order to get the house. The following is a draft transcript of a portion of the conversation:

RODRIGUEZ: I need to get that house—

CW-9: You don't got to tell him he can't buy it.

RODRIGUEZ: I need that house under my name.

RODRIGUEZ: Yo I need that house under my name so I can go—

RODRIGUEZ: [UI]

CW-9: [UI]

RODRIGUEZ: *Yeah I'll fucking shoot him right here [UI] fucking house.*

AVITABILE: Oh stop. I hook you up.

RODRIGUEZ: *I'm a be like, I'm a be like—and when the cops ask what happened I'm a say he didn't give me my fucking house!*

414. At the end of the conversation, AVITABILE describes in detail the process by which they can jointly acquire a property and use a trust in order “hide the money” originating from Jorge RODRIGUEZ from the bank. The following is a draft transcript of a portion of the conversation:

AVITABILE: So—right, so if we can get Bonney Ct. (sic) I'll buy Bonney Ct. (sic) with you.

RODRIGUEZ: Yeah, good money too for you.

AVITABILE: I'll buy it with you, we'll just do our own trust and you could put 'em in and *I'll show you how to hide the money with the bank, it's simple.*

RODRIGUEZ: *I'll do that with you.*

AVITABILE: But—

RODRIGUEZ: [UI]—

AVITABILE: 314, yeah. I'm in.

RODRIGUEZ: Look it, look it, look it, look it, look it, look it—

AVITABILE: I want the—you don't think I want the money?

RODRIGUEZ: [UI]—

CW-9: Gordo, [UI]?

RODRIGUEZ: I don't know. Look it, look it, look it, you help me, you help me with this one—

AVITABILE: I'll get it! I'll get it!

RODRIGUEZ: It's pretty good [UI] but it's up in the air.

AVITABILE: Alright, alright, I'll get it. Cause I'm not gonna sell it to [third party].

RODRIGUEZ: So what, so what, so [UI], so how we gonna—

AVITABILE: But you're gonna have to pay this guy!

RODRIGUEZ: [UI] I got you I'm gonna pay this guy I'll [UI]—

AVITABILE: Cause you're gonna need it anyway.

RODRIGUEZ: [UI] wait, wait, wait, wait—

AVITABILE: Cause he's gonna have to do the fire escapes—

RODRIGUEZ: Why, why, why do I have to [UI] house under my name?

AVITABILE: Just buy it off me. It's simple.

RODRIGUEZ: yeah but, but how—?

AVITABILE: We go to the attorney, we write it up. You're gonna put it in a trust—

RODRIGUEZ: [UI]—

AVITABILE: I got to talk to my accountant, I might go in on this deal with you so we could bring it back to the bank, you get it? And finance— that will be the first house we'll own together.

RODRIGUEZ: Yeah. Look it—[UI]—

[...]

AVITABILE: Let me just find out how much I'm gonna owe the IRS. If it's not a

lot, I'll just take your money and pay the IRS. Do you get it? I don't care. Cause I got the money from Tallman and it's payed.

RODRIGUEZ: What we, what we, what we, [UI] and we're together?

AVITABILE: Right, right. But if I owe the IRS like forty grand you're gonna have to rebuild it—I'll put my name, we're gonna form a trust, and then you take that trust into the bank. You get it? I just about caught up on my taxes. Once I do this tax return, now I can fucking—

RODRIGUEZ: Why didn't you do this fucking quicker?

AVITABILE: Alright, alright—

RODRIGUEZ: [UI]—

AVITABILE: I got it. I'm on it, I'm on it.

415. A month later on 2/4/19, AVITABILE was captured on a recording discussing a real estate venture with Jorge RODRIGUEZ and CW-9. During that conversation, CW-9 discusses outstanding rent owed to AVITABILE by CW-9. CW-9 informs AVITABILE that he just started to “dibble” and “dabble,” referring to distributing narcotics, and that CW-9 will pay off the debt shortly.

416. During the 2/4/19 recording, AVITABILE and Jorge RODRIGUEZ discuss the manner by which they will obtain a property together, and place a lien on the property to obscure the source of the funds. The following is a draft transcript of a portion of the conversation:

AVITABILE: That's about what I owe. About four grand. Another grand for tax.

UM: [UI]

AVITABILE: [UI] what you said, [UI] you don't have to give me—give me what you said, I'm fine. And I'll hold the paper on the rosters and you'll rebuild it. All's we got to do is if you're gonna go and get a bank loan on it, I'll put a lien on it—

UM: [UI]

AVITABILE: I'll put a lien on it, and then you go get a bank loan I'll just go send out the—

RODRIGUEZ: How much is the—how much is to put a lien [UI]—

UM: [UI]

AVITABILE: Huh?

RODRIGUEZ: How much is the lien?

AVITABILE: Well whatever, just twenty-five, [UI] loan [UI] we'll write it up. You know what I'm saying?

RODRIGUEZ: [UI]

AVITABILE: I want to do it soon.

RODRIGUEZ: [UI]

AVITABILE: Well no, I got to go to the town, to protect you, I'll hire which was supposed to be you—

UM: Nah you can get a [UI] though—

AVITABILE: [UI] with the town. We'll figure that out. We'll get [UI] title search for you, just use the same fucking attorney.

417. Then, Jorge RODRIGUEZ asks AVITABILE to explain the whole process:

AVITABILE: Right. So the attorney, so the attorney—

RODRIGUEZ: Break, uh, break the whole thing down

AVITABILE: Hey, so the attorney—

RODRIGUEZ: I was [UI] too!

AVITABILE: Cause—listen.

RODRIGUEZ: No one [UI]

AVITABILE: So, I'm just saying, there would be, there would be costs on you to hire, to do a title search and that. I'll pay for that and like we'll split the attorney's fees. I'm assuming probably I'll ask her, it'll probably cost twelve hundred bucks. Twelve hundred to fifteen

hundred bucks to write it, have the attorney come in, do—represent me and you.

RODRIGUEZ: That's what—when do we do it?

AVITABILE: Soon. I don't want it out there, I haven't even told [third party].

RODRIGUEZ: Well we got to do it soon cause I, I—

AVITABILE: Alright.

RODRIGUEZ: I got the money, I got the money right now—

AVITABILE: I'll call the attorney right now.

RODRIGUEZ: And if not I'm gonna send the money to the PR.

AVITABILE: No, no, just—

RODRIGUEZ: I have to pay, I have to pay [UI]—

AVITABILE: No, no, nope, nope, nope.

RODRIGUEZ: Underground.

AVITABILE: Alright so we'll get it done—

RODRIGUEZ: [UI].

AVITABILE: Can you text me, uh, his name and his address that you want me to put it in.

RODRIGUEZ: Alright.

AVITABILE: Cause I'm gonna have to have her do a HUD. The attorney's gonna prepare a HUD to protect you and me, and then we'll fuckin' uh, have—we'll just go downtown. We'll hire that attorney [UI].

RODRIGUEZ: Alright so, so, so [UI]—

AVITABILE: The next twelve—by the end of the month we'll have it done.

RODRIGUEZ: End of the month now?

AVITABILE: It's gonna take them two weeks to do a title search.

RODRIGUEZ: Alright so so I'm gonna send this money out. I gonna send this money out.

AVITABILE: Nah, nah, nah—

RODRIGUEZ: Don't leave me slacking alright? [UI]

[unrelated conversation]

RODRIGUEZ: What do you want me to do?

AVITABILE: Friday's gonna be good, just text me his information.

RODRIGUEZ: Got it.

AVITABILE: I'll, I'll, I'll call the lawyer. It's probably gonna take like two weeks for them to do it. Take—it takes ten days, you got to do a title search on URN. Then the bank—the mortgage is [UI] even though it's a normal mortgage, the bank's still gonna release that, okay, it takes a little time. And then we'll sit down with the attorney, we'll figure out—it'll probably cost us, it'll probably cost me probably 15 [UI].

RODRIGUEZ: [UI] I'm gonna, I'm gonna call my brother right now because [UI]—

AVITABILE: Send me all the all the information.

RODRIGUEZ: What do you need his name right. And His address—

AVITABILE: Name, address, I don't think I need his cell phone.

418. In August 2019, investigators learned that AVITABILE purchased a parcel of real estate located at 585 Elm Street, New Bedford, MA through an entity known as the ARA Realty Trust Corp. The ARA Realty Trust Corp. is a Massachusetts corporate entity formed on 8/21/19, which lists AVITABILE as the president, treasurer, secretary, and director, and was formed by AVITABILE. The stated business of the corporation is to “Purchase Homes.”

419. According to a Foreclosure Deed filed in the Southern Bristol County Registry of Deeds, RBS Citizens Bank granted title of 585 Elm Street, New Bedford, MA, to ARA Realty

Trust Corp. for a price of \$105,000. This Foreclosure Deed was recorded at Book 12908, Page 302 on 8/29/19. A picture of 585 ELM STREET follows:



420. Also on 8/29/19, a mortgage was recorded in the Southern Bristol County Registry of Deeds relating to 585 Elm Street, New Bedford, MA. According to the filed instrument, ARA Realty Trust Corp. granted a mortgage in 585 Elm Street, New Bedford, MA, to Summit Capital Management LLC to secure a promissory note for \$113,000. This mortgage instrument references a Loan Agreement and Promissory Note. This mortgage was signed AVITABILE.

421. On 8/27/19, CW-9 reported that Jose RODRIGUEZ closed on a house in New Bedford that was purchased with AVITABILE. CW-9 then provided investigators with an image of Jose RODRIGUEZ's Facebook account, that depicted a home, and the statement: "Me and somebody else purchased this house going to remodel this house we're gonna put it back on the market for sale inside and outside For sale pretty soon."

422. A comparison of the photograph posted by Jose RODRIGUEZ and a picture of 585 Elm Street, New Bedford, MA, obtained from the New Bedford City Assessor's Office reveals that the Facebook photograph posted by Jose RODRIGUEZ in fact depicts 585 Elm

Street, New Bedford, MA.

423. Lastly, I am aware that AVITABILE and Jose RODRIGUEZ recently travelled together to the Encore Boston Harbor casino on 11/13/19 and gambled at the roulette and blackjack tables. Two photographs of Jose RODRIGUEZ, AVITABILE together at the Encore Boston Harbor garage follows:



424. According to records obtained from the Encore Boston Harbor, since 8/19/19, AVITABILE has bought in over \$9,450 in cash. Over the same period, AVITABILE has lost \$2,585 at the casino.

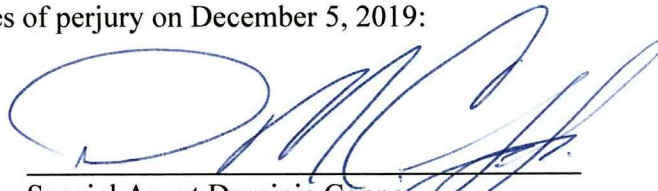
DECEMBER 5, 2019 ARRESTS

425. On December 5, 2019, 62 arrest warrants and 31 search warrants were executed in connection with this investigation. As of 10:00 a.m. this morning, 54 defendants have been arrested and 8 defendant were at large.

426. The preliminary count of firearms this morning is 28. Among the numerous firearms, ammunition, and other items seized during the execution of the search warrants, the following items were recovered:

- a. A Heckler and Koch MP5 firearm;
- b. An AR-15 assault rifle;
- c. A 12 gauge pump-action shotgun;
- d. A Glock 36 firearm;
- e. A Glock 19 firearm;
- f. A .25 caliber pistol;
- g. Two large-capacity magazines with a believed capacity of approximately 100 rounds
- h. A machete;
- i. Heroin / fentanyl, cocaine base, and marijuana;
- j. \$30,188 from a bank account; and
- k. Multiple automobiles, including a BMW 750i, Porsche Cayman, six motorcycles, a jetski, and an ATV.

Signed and sworn under the penalties of perjury on December 5, 2019:



Special Agent Dominic Coppo
Federal Bureau of Investigation

OPERA ION HRONE DOWN

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